

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

December 6, 1979 8:52

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Enclosed is our final response to C. E. Murphy's November 16, 1979, letter, RII:EHC 50-518/79-24, 50-519/79-24, 50-520/79-24, and 50-521/79-24, regarding activities at Hartsville Nuclear Plants A and B which appeared to have been in violation of NRC regulations.

We have reviewed the subject inspection report and find no proprietary information in the report. If you have any questions regarding this matter, please call Jim Domer at FTS 854-2014.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills
L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

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ENCLOSURE

FINAL RESPONSE TO NRC-OIE LETTER
FROM C. E. MURPHY TO H. G. PARRIS
DATED NOVEMBER 16, 1979

REFERENCE RII: EHG 50-518/79-24, 50-519/79-24,
50-520/79-24, 50-521/79-24

This report responds to the Notice of Violation described in Appendix A of the IE Inspection Report referenced above. This is the final report on these noncompliances.

Noncompliance Item - Deficiency 518/79-24-02

- A. As required by Criterion V of Appendix B to 10 CFR 50, and as implemented by PSAR Section 17.1A.5, "Activities affecting quality shall be perscribed by documented instructions, procedures, . . . and shall be accomplished in accordance with those instructions, procedures, . . ." TVA Procedure CEP 8.03, Revision 8, requires that the Welding Materials Issue Inspector enter heat or lot number of rod on welding material requisitions when issued.

Contrary to the above, on October 16, 1979, heat or lot numbers were not being entered on weld material requisitions at the issue station for unit A1.

This is a deficiency.

Response

1. Corrective Steps Taken and Results Achieved

A revision request to CEP 8.03 was made on November 21, 1979, to bring CEP 8.03 into agreement with the OEDC QA Manual for ASME Section III Nuclear Power Plant Components (NCM) which does not require traceability of weld material to actual production. TVA also ascertained that traceability of weld material to production is not an ASME Section III requirement.

2. Corrective Steps Taken to Avoid Further Noncompliance

The revision to CEP 8.03 will be issued to the site by December 7, 1979, deleting the requirement for entering heat or lot number of welding rods on the welding material requisition. This change will allow the Welding Materials Issue Inspector to note the size and type of weld material instead of the heat or lot number.

This revision will make the NCM and CEP 8.03 consistent with each other and will prevent further noncompliances associated with entering of heat or lot number on welding material requisitions.

3. Date When Full Compliance Was Achieved

Full compliance will be achieved on December 7, 1979.

Noncompliance Item - Infraction 518/79-24-01

- B. As required by Criterion II of Appendix A to 10 CFR 50, and as implemented by PSAR Section 17.1A.2, "The program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained." TVA's Procedure QCI 502R0 specifies two maximum reinforcements for AWS D1.1 welds of 1/8 inch.

Contrary to the above, on October 17, 1979, accepted weld A1 PED 00038R5 had reinforcement exceeding the maximum specified. This indicates that welding and inspection personnel have not been provided indoctrination and training sufficient to ensure their proficiency with regard to weld requirements.

This is an infraction.

Response

1. Corrective Steps Taken and Results Achieved

The reinforcement of weld A1 PED 00038R5 was corrected soon after discovery of the unacceptable condition. The weld reinforcement of weld A1 PED 00038R6 now meets AWS D1.1 requirements.

2. Corrective Steps Taken to Avoid Further Noncompliance

The welders who worked on the A1 pedestal and the inspector involved have been informed of the correct interpretation of the applicable acceptance criteria. Welding and inspection personnel indoctrination and training have not been changed because the proper acceptance criteria is already presented.

3. Date When Full Compliance Was Achieved

Full compliance was achieved on October 18, 1979.