

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
500C Chestnut Street Tower II

JAN 11 1979

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:

This is in response to C. E. Murphy's December 20, 1978, letter, RII:BRC 50-518/78-16, 50-519/78-16, 50-520/78-16, 50-521/78-16, regarding activities at Hartsville Nuclear Plants A and B which appeared to have been in violation of NRC regulations. Our response to this infraction item is provided in the enclosure.

We have reviewed the subject inspection report and find no proprietary information in it.

Very truly yours,

J. E. Gilleland
for J. E. Gilleland
Assistant Manager of Power

Enclosure

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ENCLOSURE

RESPONSE TO NRC-OIE LETTER
FROM C. E. MURPHY TO N. B. HUGHES
DATED DECEMBER 20, 1978

(REFERENCE RII:BRC 50-518/78-16, 50-519/78-16, 50-520/78-16, 50-521/78-16)

The report responds to the following Notice of Violation described in Appendix A of IE Inspection Report RII:BRC 50-518/78-16, 50-519/78-16, 50-520/78-16, and 50-521/78-16.

Noncompliance Item - Infraction -518-78-16-01, 519-78-16-01, 520-78-16-01,
and 521-78-16-01

Criterion V of Appendix B to 10 CFR 50, as implemented by PSAR Section 17.1A.5, requires in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, . . . and shall be accomplished in accordance with those instructions, procedures" Construction Engineering Procedure 6.03 requires that design information (i.e., design and construction specifications) be received and filed in the Master Document File in the Document Control Unit and distributed to applicable Engineering Unit Supervisors. Procedure EN DES EP 3.04 requires that specifications be formally revised and reissued within 60 days of issuing a Specification Revision Notice (SRN).

Contrary to the above, revisions to Specification N6C-875, "Earth and Rock Foundations and Fills" have not been controlled as required. Specific examples are as follows:

1. Plant A Document Control Unit Master File did not contain SRN 3, SRN 4, SRN 6 and SRN 7 to Revision 5 of Specification N6C-875.
2. Quality control personnel in Plant A did not have access to SRN 3, SRN 4 and SRN 7 to Revision 5 of Specification N6C-875.
3. Specification N6C-875 was not being revised and reissued within 60 days of the issuance of Specification Revision Notices (SRN's). SRN 3 to Revision 5 of the specification was issued on May 23, 1978, SRN 4 on June 22, 1978, SRN 5 on July 12, 1978, and SRN 6 on August 21, 1978. Revision 5 was the current issue of the specification on file on the date of inspection, November 30, 1978.

This is an infraction.

Response

- Item 1. The Plant A Document Control Unit Master File did not contain SRN 3, SRN 4, SRN 6, and SRN 7 to Revision 5 of the Construction Specification N6C-875, due to an inadvertent error in the routing of the specification from the Hartsville Construction Project Manager's office to the Plant A Document Control Unit. The Plant B Document

Control Unit Master File did contain SRN 3, SRN 4, SRN 6, and SRN 7 to Revision 5 of Construction Specification N6C-875.

In order to prevent recurrence of routing errors for Construction Specifications, the Hartsville Nuclear Plant Construction Project Manager in a memorandum to the Director of Engineering Design dated December 1, 1978 (HTN 761130 107), has requested that future distributions of construction specifications be made directly to the Supervisors of the Document Control Unit, for Plants A and B, respectively. This distribution change has been implemented by EN DES as of this date to prevent recurrence of similar distribution problems.

- Item 2. Quality Control personnel in Plant A did not have access to SRN 3, SRN 4, and SRN 7 to Revision 5 of Construction Specification N6C-875 because the SRN's were never received by the Plant A Document Control Unit for the reasons discussed in item 1 above. The request for direct distribution of SRN's and revisions of construction specifications to the Document Control Unit of each plant should alleviate the possibility of quality control personnel in Plant A not having access to these documents.

An investigation by Plant A personnel revealed that none of the Category I earth and rock foundation and fill inspections performed after issuance of SRN 3 up to the present were affected by the content of SRN's 3, 4, 6, and 7. Subsequently, the integrity of the Category I earth and rock foundations and fills placed during this period of time is not in question as a result of this infraction.

- Item 3. Construction Specification N6C-875 indeed had not been revised within 60 days from the date of issue of SRN's 3, 4, 5, 6, as required in EN DES-EP 3.04, "EN DES Construction Specifications - Preparation, Review, and Approval." However, on December 7, 1978, Revision 6 to Construction Specification N6C-875 was issued incorporating SRN's 3, 4, 5, 6, and 7. On the date of issue of Revision 6, SRN 8 dated October 25, 1978, and SRN 9 dated November 21, 1978, were outstanding against the construction specification. The NRC-OIE, Region II, Inspection Report containing this infraction was not received by EN DES until December 27, 1978; at which time the 60-day revision time frame specified in EN DES-EP 3.04 for revision of the construction specification after issuance of SRN 8 had expired.

EN DES is presently revising Construction Specification N6C-875 to incorporate SRN8 and SRN 9. The revision should be completed by March 1, 1979.

In order to prevent recurrence of this situation, the 60-day revision requirements of EN DES-EP 3.04 have been reiterated and emphasized to all affected EN DES employees.