

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

April 28, 1980

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:

YELLOW CREEK NUCLEAR PLANT UNITS 1 AND 2 - NRC REGION II LETTER  
RII:WPK 50-566/80-03 AND 50-567/80-03 - REVISED RESPONSE TO  
INFRACTION

The subject letter dated April 9, 1980, documented a verbal request for additional information on infraction 50-566/80-03-01 and 50-567/80-03-01, failure to establish adequate measures to control radiography. The initial response to this infraction was submitted on March 24, 1980, and additional information was submitted on April 21, 1980. Enclosed is our revised response to this infraction.

If you have any questions concerning this matter, please get in touch with D. L. Lambert at FTS 854-2581.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager  
Nuclear Regulation and Safety

Enclosure

cc: Mr. Victor Stallo, Jr., Director (Enclosure) ✓  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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## ENCLOSURE

### YELLOW CREEK NUCLEAR PLANT UNITS 1 AND 2 FAILURE TO ESTABLISH ADEQUATE MEASURES TO CONTROL RADIOGRAPHY REVISED RESPONSE TO NRC INFRACTION 50-566/80-03-01 AND 50-567/80-03-01

#### Infraction

As required by 10 CFR 50 Appendix B, Criterion IX and as implemented by Tennessee Valley Authority (TVA) Topical Report TVA-TR-75-A1, Section 17.1A.9, "Measures shall be established to assure that special processes, including---nondestructive testing are controlled and accomplished---in accordance with applicable codes---." ASME Code Section II paragraph X3334.4 requires that penetrameters be placed adjacent to the weld seam; in addition paragraph NE-5211 requires full radiography for longitudinal butt welded containment joints.

Contrary to the above, on February 7, 1980, seven radiographs of containment structural butt welds exhibited penetrameters and shims extending into the weld obscuring part of the area of interest.

#### Corrective Actions Taken and Results Achieved

All radiographs made before February 22, 1980 (6,849), have been reexamined for similar deficiencies, and an additional 102 were found and nonconformed.

Reevaluation of the 102 radiographs initially nonconformed has resulted in the determination that shims were not overlapping into the weld in 95 cases, and only 7 of these welds will require reradiographing. As stated in TVA's March 24, 1980, letter to J. P. O'Reilly, two of the radiographs cited by the NRC (seam A1 increments 1 to 2 and seam A2 increments 20 to 21) were reevaluated and found to be acceptable. Thus only 12 welds will have to be reradiographed.

#### Steps Taken to Avoid Further Recurrence

In order to prevent a recurrence, the film interpreters and radiographers have been instructed in the requirements of shim placement.

In addition, Chicago Bridge and Iron (CBI) will issue a special written instruction informing all radiographers and film interpreters on proper placement of shims. This Special Instruction No. 5 will become part of the Special Instruction Folder No. 3.0 which is used in training new radiographers and film interpreters.

#### Date of Full Compliance

The special instruction on shim placement has been issued, and the twelve welds will be reradiographed by June 1, 1980.