TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

July 9, 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:

Enclosed is our response to C. E. Murphy's June 17, 1980, letter, RII:PKV 50-518/80-09, 50-519/80-09, 50-520/80-09, and 50-521/80-09, regarding activities at Hartsville Nuclear Plant 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 857-2014.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L M Mills by

L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

ENCLOSURE
HARTSVILLE NUCLEAR PLANT
RESPONSE TO NRC-OIE LETTER
FROM C. E. MURPHY TO H. G. PARRIS
DATED JUNE 17, 1980

(Reference: RII:PKV 50-518, 50-519, 50-520, 50-521/80-9)

This report responds to the Notice of Violation described in Appendix A of the OIE Inspection Report referenced above. This is the final response on the subject noncompliance.

Noncompliance Item - Infraction 518/80-09-01

As required by Criterion XIII of Appendix B to 10CFR50, and as implemented by the PSAR, Section 17.1A.13, measures shall be established to control the storage and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration. The TVA valve list requires Level B storage for valve No. E12F105.

Site Procedure M401, Revision 5, and M402, Revision 4, specifies Level D storage of stainless steel pipe and carbon pipe respectively. Procedure CEP 13.02 specifies that Level B storage include protection from the elements and uniform heating and temperature. It specifies that Level D storage include cribbing and storage in a well-drained area.

Contrary to the above, May 23, 1980, site procedures for storage of piping were inadequate in that they did not address inplant storage and were not being applied by site personnel to inplant storage. In addition, there was no procedure requiring inspections of inplant storage of piping or equipment. This resulted in numerous safety-related piping subassemblies being stored in the auxiliary building in direct contact with wet floors or standing water. Examples are subassembly Nos. 17AB-ESW-145-1, 17AB-ESW-74-1, 17AB-ESW-353-14, 17AB-ESW-68-1, 17AB-ESW-143-2, 17AB-RHR-6-5, 17AB-RHR-7-1, 17AB-RHR-15-4, 17AB-RHR-21-7, 17AB-RHR-34-2, 17AB-RHR-72-1, and 17AB-SPCU-7-4. This also resulted in 24-inch motor-operated gate valve No. E12F105 being stored in the auxiliary building unprotected and without uniform heating.

This is an infraction.

Response

1. Corrective Steps Taken and Results Achieved

TVA has determined through reviewing procedures applying to the receiving, inspection, storage, and preventive maintenance program (RIS&PM) that inplant storage of equipment should have been adequately covered by the PREVENT Maintenance Program as required

by CEP 13.02, "Storage and Preservation of Materials, Components, and Systems." On receipt of the equipment, a computer input for the individual piece of equipment is generated. This input contains the storage level, location, and preventive maintenance (PM) requirements for the item involved, and the frequency of the PM. During the first week of each month, the computer generates cards containing this information for items requiring PM for that month. Inspectors verify that the required PM is performed and submit the completed card to update the program. This program applies to both items stored in the warehouse area and to inplant storage. We believe this is an adequate means of ensuring preventive maintenance on equipment.

Concerning inplant piping RIS&PM, however, we determined that procedures are not adequate. As a result, we are revising SOP-30 to require quarterly surveillance inspection of inplant pipe storage.

We have also investigated and corrected the storage deficiencies of piping and equipment noted in your referenced letter as follows:

> All of the listed piping subassemblies are being placed so that they are no longer in contact with wet floors or standing water.
>
> The subject valve now conforms to Level B. Storage level and PM were last verified in April 1980 and are due again in October 1980. We are confident that this condition would have been discovered during the next PREVENT inspection. During February and March 1980, special instructions listing valve handling requirements were added to all work packages. Inadvertently, the work package for the subject valve was not changed. The special instructions are now being added to that work package.

Corrective Steps Taken to Avoid Further Noncompliance

Revision of SOP-30, "Preventive Maintenance," to require quarterly surveillance inspection of inplant pipe storage should prevent further noncompliance.

Site policy has been established such that inplant storage levels will be specified on the work package, and craft compliance is required. Preventive maintenance requirements are determined from manufacturer's recommendations. We will reevaluate to determine if increased frequency will be necessary.

Date When Full Compliance Will Be Achieved

We will be in full compliance on storage of equipment and piping by July 21, 1980. Reevaluation of PM frequency will be completed by August 8, 1980.

Our estimated completion date on the approval and implementation of SOP-30 is August 8, 1980, at which time we will be in full compliance in all aspects of our RIS&PM program.