

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

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August 7, 1981

BLRD-50-438/81-44
BLRD-50-439/81-46

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:

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2 - SECONDARY CONTAINMENT
MODIFICATIONS - BLRD-50-438/81-44, BLRD-50-439/81-46 - FIRST INTERIM
REPORT

The subject deficiency was initially reported to NRC-OIE Inspector
D. Quick on July 10, 1981 in accordance with 10 CFR 50.55(e) as
NCR BLN QAB 8102. Enclosed is our first interim report. We expect to
submit our next report by October 7, 1981.

If you have any questions concerning this matter, please get in touch with
D. L. Lambert at FTS 857-2581.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

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

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ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2
SECONDARY CONTAINMENT MODIFICATIONS
BLRD-50-438/81-44, BLRD-50-439/81-46
10 CFR 50.55(e)
FIRST INTERIM REPORT

Description of Deficiency

Engineering Change Notice (ECN) 1268 was issued by the Bellefonte Design Project to raise the secondary containment dome to allow adequate room for economic handling of jacks and equipment required for inservice inspection of the vertical tendons on the primary containment. The intent of Engineering Procedure EN DES-EP 4.02, "Engineering Change Notices - Handling," is to get approval of Thermal Power Engineering (TPE) Branches for changes of this magnitude where they are extensively involved. However, as this procedure is written in a manner that allows various interpretations, approval of Civil and Nuclear Engineering Branches was not solicited.

Interim Progress

EN DES-EP 4.02 will be rewritten to make it clear that the TPE Branches approve significant changes before issuance of an ECN. The present wording uses the term "safety system," which does not explicitly include safety-related structures. Revisions to EP 4.02 should be complete by September 1, 1981.

TVA is analyzing the potential effects of issuing an ECN of this nature without prior review by the TPE Branches. This analysis will consider the required review of the revised design documents resulting from issuance of the ECN.