

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

02 JAN 8 P 2:00

January 6, 1982

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

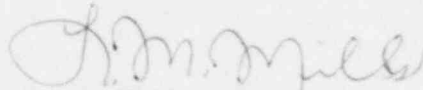
Dear Mr. O'Reilly:

Enclosed is our response to R. C. Lewis' December 10, 1981 letter to H. G. Parris transmitting Inspection Report Nos. 50-518/81-20, -519/81-20, -520/81-20, and -521/81-20 regarding activities at our Hartsville Nuclear Plant which appeared to have been in violation of NRC regulations. We have enclosed our response to Appendix A, Notice of Violation. If you have any questions, please call Jim Domer at FTS 858-2725.

To the best of my knowledge, I declare the statements contained herein are complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

ENCLOSURE
RESPONSE TO NRC-OIE LETTER
FROM R. C. LEWIS TO H. G. PARRIS
DATED DECEMBER 10, 1981

(Reference: Report Nos. 50-518/81-20, 50-519/81-20,
50-520/81-20, and 50-521/81-20)

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

Noncompliance Item-Severity Level V - Violation 518/81-20-01

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented procedures and instructions and shall be accomplished in accordance with these procedures and instructions. Specification N6C-875 and its referenced specification G-9 specifies that surfaces too smooth for proper bonding shall be scarified before placing additional fill.

Contrary to the above, on November 19, 1981, during backfill operations adjacent to the ERCW pipeline in the area of the A-1 spray pond, backfill was placed on top of a smooth surface without any prior scarifying. The backfill surface had a smoothed polished surface as a result of sealing the surface with tampers at the close of fill operations on the previous day.

This is a Severity Level V Violation (Supplement II.E).

Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. The Reasons for the Violation

The earthfill placement inspector was aware of the scarification requirement. The inspector was accustomed to scarifying as performed in general earthfill operations; however, he did not believe that scarification could be accomplished within the confines of the pipe trench that was being back-filled. Scarifying would have been resumed when the backfill reached the level of the surrounding fill.

3. Corrective Steps Taken and Results Achieved

Inspection and construction personnel were instructed to begin lightly scarifying between layers on all backfill regardless of circumstances.

In a December 18, 1981, telephone conversation with appropriate design personnel, it was determined that the material placed in the cited fill area could remain in place. This determination was based on the limited area/extent of the backfill in question and the high degree of compaction. This decision was documented on Quality Control Investigation Report No. 30417.

4. Corrective Steps Taken to Avoid Further Noncompliance

On December 18, 1981, Field Change Request (FCR) No. 4358 was orally approved to clarify the requirements for scarification during backfill operations. The change provides a clarification that scarification between layers of earthfill placed using hand-held compaction equipment is required only within specified areas. The specified areas are within a distance of twenty feet beyond the top of the slope of the inside face of the ESW spray pond liner and twenty feet beyond the exterior face of structures within the liner. This information will be incorporated into project construction specification N6C-875; but until revision of the specification, the FCR will document the interpretation.

All earthfill inspection personnel have been notified of the FCR interpretation by memorandum dated December 21, 1981.

5. Date When Full Compliance Was Achieved

Full compliance was achieved on December 21, 1981.