

TENNESSEE VALLEY AUTHORITY II
CHATTANOOGA, TENNESSEE 37401
ATLANTA, GEORGIA

400 Chestnut Street Tower II

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May 21, 1982

U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2 - RESPONSE TO VIOLATION
50-438,50-439/82-09-06 - BORIC ACID PUMP ROOM

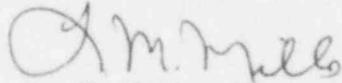
This is in response to F. J. Long's letter dated April 22, 1982, report numbers 50-438/82-09, 50-439/82-09, concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations. Enclosed is our response to the citation.

If you have any questions concerning this matter, please get in touch with R. H. Shell at FTS 858-2688.

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 Licensing

Enclosure

cc: Mr. Richard C. DeYoung, 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
BORIC ACID PUMP ROOM
SEVERITY LEVEL IV VIOLATION 50-438, 50-439/82-09-06

Description of Deficiency

10 CFR 50, Appendix D, Criterion IX and Tennessee Valley Authority (TVA) Final Safety Analysis Report Section 17.1A.9 requires that "Measures shall be established to assure that special processes, including welding, heat treating, and nondestructive testing, are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements."

Bellefonte's Quality Control Procedure BNP-QCP-10.13, Rev. 5, requires that all welding shall be performed using qualified detail weld procedures.

Contrary to the above, on March 9, 1982, a welder informed the resident inspector that he had remelted three pipe welds in the boric acid pump room without a detail weld procedure.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for Violation

The violation occurred as the result of a failure to follow procedure by the craft welder, in order to complete the assigned task. TVA performed essentially three investigations concerning the reheated welds in the boric acid pump room. The initial investigation resulted in all individuals questioned stating they had no knowledge of any welds being reheated. The second investigation was initiated by informing the individuals involved that they would be granted amnesty for any information they could provide concerning reheating of welds. All individuals questioned by TVA again stated no knowledge of any welds being reheated. The final inquiry by the craft superintendent revealed that the craft foreman had instructed the welder to cold bend the piping to achieve the proper alignment. The welder attempted to cold bend the pipe for alignment, but was unsuccessful in his attempt. The welder then proceeded, on his own, to reheat the three cited welds to provide alignment. The craft foreman knew the welds had been reheated but did not give direct instructions to reheat the welds. The craft foreman did, however, provide false statements during the investigation in that he denied having any knowledge of the welds being reheated. The welder and foreman were both knowledgeable of the fact that the welder had performed work that was not governed by a qualified detail weld procedure and the work was in direct violation of the TVA Quality Assurance Program.

Corrective Action Taken and Results Achieved

The cited welds, in addition to those identified by QCIRs 13,352 and 17,774 during the investigation of the problem, have been cut out and rewelded using approved processes and procedures.

Steps Taken to Avoid Further Violations

Under normal procedure, the individuals would have received disciplinary action in the form of suspension or termination. However, because of the circumstances involving the investigation by TVA and the granting of amnesty by TVA for information, the craft welder and foreman were formally reprimanded and reinstructed in the importance of complying with the TVA Quality Assurance Program. TVA believes the individuals were acting alone, and that remelting of welds is an isolated occurrence.

Date of Full Compliance

TVA was in full compliance on March 26, 1982, at which time all of the affected pipe welds had been reworked, inspected, and accepted.