

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

32 SEP 15 4 5 . 00 September 13, 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
50-438,50-439/82-18-01 - FAILURE TO FOLLOW PROCEDURE FOR HANGER
INSPECTIONS

This is in response to D. M. Verrelli's letter dated July 26, 1982, report numbers 50-438/82-18, 50-439/82-18, concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations. The response to this violation has been delayed. This delay and request for extension was communicated to R. V. Crlenjak (NRC-OIE RII) by telephone on August 18, 1982. 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

D S Kammer

D. S. Kammer
Nuclear Engineer

Enclosure

cc: Mr. Richard C. DeYoung, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2 RESPONSE TO SEVERITY LEVEL V VIOLATION 50-438,50-439/82-18-01 FAILURE TO FOLLOW PROCEDURE FOR HANGER INSPECTIONS

Description of Deficiency

10 CFR 50, Appendix B, Criterion V, as implemented by Bellefonte FSAR section 17, paragraph 17.1A.5, requires in part that activities affecting quality be accomplished in accordance with instructions, procedures, or drawings. Bellefonte QCP 6.17, R3, states the procedure and acceptance criteria for inspection of seismic supports.

Contrary to the above, between June 8-11, 1982, activities affecting quality were not being accomplished in accordance with documented procedures in that a reinspection of seven completed and inspected seismic supports revealed three supports with deviations from the documented requirements.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reasons for the Violation

Several factors have contributed to the root cause of the subject violation as stated below:

- A. Improper installations of items/components and/or unauthorized rework or inadvertent damage to items/components after QC inspections were performed.
- B. Improper QC inspections of items/components because of:
 - 1. Lack of proper training for QC inspectors.
 - 2. Insufficient "in-house" auditing of QC inspections.

Corrective Action Taken and Results Achieved

Quality Control Investigation Reports (QCIR) have been initiated for each item found to be discrepant. They will be processed and the items corrected per applicable procedures and work schedules.

Steps Taken to Avoid Further Violations

Actions which have or will be taken are noted below.

- A. A comprehensive program is being formulated to provide more intensive training for QC inspectors. This program will include classroom and field training on a scheduled basis for all applicable personnel. Periodic testing will be required of each individual to retain certification to applicable procedures.
- B. The Hanger Engineering Unit (HEU) internal audit inspection program has been enhanced by providing personnel with more experience regarding inspection of hangers. The program is showing evidence of improvement based on the latest finding of the HEU audit team.
- C. The engineering organization will coordinate more closely with craft personnel in the field to resolve discrepant items before QC inspections. This includes more direction to the craftsmen to avoid unauthorized work and damage to items/components previously installed and inspected in the field.
- D. A third reinspection is being performed on those hangers previously inspected and accepted by the HEU internal audit program over the last six months. Results of this inspection are to be evaluated jointly between TVA's Division of Construction and Division of Engineering Design to determine if some of the existing QC inspection criteria may be reclassified as nondocumented engineering inspections. The engineering inspection would be performed on certain noncritical aspects which do not compromise the structural integrity or safety significance of the hangers.
- E. A memorandum has been issued by the steam fitter superintendent to steam fitter personnel emphasizing the total commitment to the QA/QC program. This memorandum includes instruction which prohibits unauthorized rework to hangers.

Date of Full Compliance

The corrective actions noted in B, C, and E are in effect. The other corrective actions will be in effect by December 29, 1982.