

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA TENNESSEE 37401
400 Chestnut Street Tower II

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September 13, 1982

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

Dear Mr. O'Reilly:

Enclosed is our response to D. M. Verrelli's August 12, 1982 letter to H. G. Parris transmitting Inspection Report Nos. 50-518/82-08 and 50-520/81-20, regarding activities at our Hartsville Nuclear Plant A 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

DS Kammer

D. S. Kammer
Nuclear Engineer

Enclosure

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ENCLOSURE
RESPONSE TO NRC-OIE LETTER FROM D. M. VERRELLI
TO H. G. PARRIS DATED AUGUST 12, 1982
(Reference: REPORT NOS. 50-518/82-08 AND 50-520/82-08)

Appendix A

Noncompliance Item 518,520/82-08-01

10 CFR 50 Appendix B, Criterion V as implemented by the PSAR Section 17.1A.5 requires that activities affecting quality be accomplished in accordance with documented instructions, procedures, or drawings. Receiving, Storage and Preventive Maintenance Inspection Manual (RS&PMI), Revision 7, contains the instructions used for storage and preventive maintenance of materials and equipment.

The following activities affecting quality were not accomplished in accordance with documented procedures:

1. RS&PMI Manual, Section 6TD, paragraph 2, requires a monthly inspection be performed to verify that material which has exceeded its shelf life is discarded.

Contrary to the above, several gallons of protective coating stored in warehouse "CWL" had exceeded the manufacturer's specified shelf-life with no hold tags or Quality Control Investigation Reports documented.

2. RS&PMI Manual, Section 6QC, paragraph 1, requires the PVC conduit be stored in bundles out of direct rays of sun.

Contrary to the above, PVC conduit located in the east issue laydown yard was stored in direct sunlight.

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

Response

Item 1

1. Admission of Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. The Reasons for the Violation

Inspection of the protective coating to verify shelf-life was inadvertently dropped from the inspection program. The employee responsible for the inspection was terminated due to the deferral of construction, and we failed to reassign the responsibility.

3. Corrective Steps Taken and Results Achieved

A QCIR has been written to place the protective coatings on hold to prevent use.

4. Corrective Steps Taken to Avoid Further Noncompliance

Protective coatings shelf-life verification inspection has been added to the preventive maintenance computer program (PREVENT) to ensure periodic inspection is performed.

5. Date When Full Compliance Will Be Achieved

We will be in full compliance by November 18, 1982.

Item 2

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. The Reasons for the Violation

Investigation into the storage of PVC conduit in direct sunlight revealed that the vendor, Carlon of Cleveland, Ohio, had indicated to site personnel that covered storage of the material was not necessary.

3. Corrective Steps Taken and Results Achieved

The PVC conduit will be covered and stored as indicated in the RS&PMI manual.

4. Corrective Steps Taken to Avoid Further Noncompliance

Personnel responsible for storage will be reinstructed as to the storage requirements for PVC conduit as indicated by the RS&PMI manual. Also, the vendor, Carlon, shall be contacted to verify storage procedures for their conduit.

5. Date When Full Compliance Will Be Achieved

We will be in full compliance by November 18, 1982.