

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37404  
400 Chestnut Street Tower II

USNRC REGION II  
ATLANTA, GEORGIA

September 7, 1982

82 SEP 10 A10: 1<sup>u</sup>

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 UNIT 1 - REVISED RESPONSE TO VIOLATION 50-438/82-12-11 - TOOL AND MATERIAL CONTROL

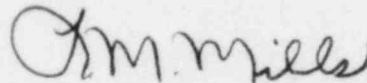
This is in response to F. J. Long's letter dated May 21, 1982, report numbers 50-438/82-12, 50-439/82-12, concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations. The previous response to this violation was submitted June 21, 1982. As discussed with J. D. Wilcox by telephone on June 29 and September 1, 1982, enclosed is our revised response to the citation.

If you have any questions concerning this matter, please get in touch with R. H. Shell at F/S 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 UNIT 1  
REVISED RESPONSE TO SEVERITY LEVEL V VIOLATION 50-438/82-12-11  
TOOL AND MATERIAL CONTROL

Description of Deficiency

10 CFR 50, Appendix B, Criterion V and Tennessee Valley Authority (TVA) Final Safety Analysis Report, Section 17.1A.5 requires that activities affecting quality be accomplished in accordance with procedures and drawings.

Bellefonte Quality Control Procedure BNP-QCP-6.16, Rev. 0, "Cleanliness Control During Piping System Installation" states:

Paragraph 6.1 -

Prior to installation the crafts shall clean all piping material for those systems specified for cleaning per CONST Specification N4M-891.

Paragraph 6.2 -

After cleaning the crafts shall maintain cleanliness control of system by ensuring that all openings on piping materials and equipment are sealed or capped at all times when work is not in progress.

BNP-QCP-7.9, Rev. 8, "Fitup & Cleanliness" states:

Paragraph 6.3.1 (B) -

The responsible craft foreman has assured that the piping interior is clean in accordance with the criteria of Field Construction Procedure (FCP) 6.1.2 and indicate such by signing the back of the fitup cards.

Contrary to the above, during the past several months numerous proof of cleanliness flushes have been performed on safety-related systems. During these flushes, numerous tools/materials were obtained from inside these systems indicating that these systems were not constructed in a clean condition.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for the Violation

The violation occurred because of the lack of an adequate QC inspection program for piping interior cleanliness.

Corrective Action Taken and Results Achieved

Investigations performed by TVA as the result of the violation indicate that the present program and procedure governing piping interior cleanliness inspection was not adequate mainly because of poor performance of craft personnel in following the existing procedure. TVA has decided to revise the QA program and procedure to require a QC inspection before fitup of piping components.

Steps Taken to Avoid Further Violations

BNP-QCP-7.9 will be revised to require a QC inspection to verify cleanliness before fitup of piping components.

Date of Full Compliance

Full compliance will be achieved upon issuance of the revision to QCP-7.9 requiring QC inspection of piping interior cleanliness and corresponding certification of the QC inspectors. TVA expects to complete these actions by October 15, 1982.