TENNESSEE VALLEY AUTHORITY

CHATTANOOGA. TENNESSEE 37401

400 Chestnut Street Tower II

September 24, 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 - REVISED RESPONSE TO VIOLATION 50-438,50-439/82-22-01 - VIOLATION OF CABLE MINIMUM BEND RADIUS

This is in response to R. C. Lewis' letter dated August 12, 1982, report numbers 50-438/82-22, 50-439/82-22, 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 September 9, 1982. As discussed with D. M. Verrelli by telephone on September 17, 1982, enclosed is our revised response to the citation. The response was revised to provide the expected date full compliance will be achieved.

If you have any quastions concerning this matter, please get in touch with R. H. Shell at F.5 858-2688.

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, D.C. 20555

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ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2
REVISED RESPONSE TO SEVERITY LEVEL IV VIOLATION 50-438,50-439/82-22-01
VIOLATION OF CABLE MINIMUM BEND RADIUS

Descritpion of Deficiency

10 CFR 50, Appendix B, Criterion V as implemented by PSAR Section 17.1.5 requires that activities affecting quality be accomplished in accordance with documented instructions, procedures, or drawings. General Construction Specification G-38, paragraph 3.2.1.2, identifies cables which have a minimum bend radius in excess of 12 inches.

Contrary to the above, cable identified as having a minimum bend radius exceeding 12 inches was installed in vertical cable tray fittings which have a 12-inch radius. This installation causes the cable bend radius to be violated.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for the Violation

The design of the cable tray system was based on numerous factors. In some cases, the bending radius specified in General Construction Specification G-38 for the larger shielded power cables was not adequate y considered by the designers.

Corrective Action Taken and Results Achieved

An investigation is being made to determine if the as-installed condition will provide a suitable service life for the cable. Nonconformance report (NCR) 1889, which was reported to NRC Inspector R. V. Crlenjak on August 6, 1982, has been written to document this concern. A review is being made of design requirements at other TVA nuclear plants, and nonconformance reports will be written if any deficiencies are found.

Steps Taken to Avoid Further Violations

A hold has been placed on installing further shielded power cable in the cable tray system until resolution of this concern. Other action to prevent further noncompliance will be determined during investigation and resolution of NCR 1889.

Date of Full Compliance

Full compliance will be achieved by December 20, 1982.