

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

March 31, 1983 45
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U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2 - RESPONSE TO VIOLATIONS
50-438, 50-439/83-02-01, INADEQUATE DRAWING CONTROL, 50-438,
50-439/83-02-02, SUPPORTS FOR REMOTE OPERATORS

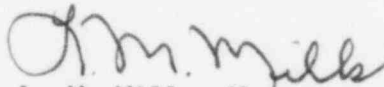
This is in response to D. M. Verrelli's letter dated February 25, 1983, report numbers 50-438/83-02, 50-439/83-02, concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations. The response to these violations has been delayed. This delay and request for extension was communicated to Kerry Landis (NRC-OIE RII) by telephone on March 15, 1983. An additional request for an extension for the response to violation 50-438/83-02-04, Inadequate Construction Operating Instructions, was communicated to Paul Fredrickson (NRC-OIE RII) by telephone on March 30, 1983. That response will now be submitted on April 18, 1983. Enclosed is our response to the citations.

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, D.C. 20555

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ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO SEVERITY LEVEL V VIOLATION - 50-438, 50-439/83-02-01
INADEQUATE DRAWING CONTROL

Description of Deficiency

10 CFR 50, Appendix B, Criterion VI and the accepted QA Program (TVA-TR75-1A, Rev. 5) Section 17.1A.6 require that measures be established to control the issuance of drawings, including changes thereto, which prescribe activities affecting quality. These measures shall assure that drawings, including changes, are distributed to and used at the location where the prescribed activity is performed.

TVA's Quality Assurance Program Policy (QAPP 6) Rev. 2, Paragraphs B.1, B.3, and B.4 state the following: "Provisions shall be delineated in procedures/instructions to control the issuance of documents that prescribe activities affecting quality... Provisions shall be established, delineated, and executed to preclude the use of obsolete or superseded documents at locations where the prescribed activities are being performed . . . An updated document list or equivalent shall exist to assure that obsolete or superseded documents are replaced in a timely manner by updated applicable document revisions".

Bellefonte's Quality Control Procedure, BNP-QCP-10.2, Rev. 9, "Drawing Control" states the following in paragraph 6.2.4: "All unit controlled drawing files shall be maintained current by the responsible unit, and all craft controlled drawings shall be maintained current by QCRU. Obsolete or superseded drawings shall be removed from the files and destroyed or they shall be prominently identified as obsolete or superseded."

Contrary to the above, drawings have not been controlled in that during the week of January 3, 1983, numerous examples of craft controlled drawings were identified as obsolete. (Unit 1 & 2)

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reasons for the Violation

The violation occurred due to inadequate procedural control of drawing distribution. The inadequate control resulted in lack of responsibility for assurance of proper drawing revision by the individuals to whom the drawings were assigned.

The drawings identified by the resident inspector had been lost by the steamfitter foreman. All of the drawings had been replaced previous to the inspection by the resident inspector and the steamfitter foreman possessed the correct revisions at that time.

Corrective Steps Taken and Results Achieved

The incorrect revision drawings were returned to QCRU and destroyed. The Document Control Unit (DCU), formerly QCRU, is currently performing a review of all craft drawings and will resolve discrepancies accordingly.

Corrective Steps Taken to Avoid Further Violation

BNP-QCP-10.2, Drawing Control, is being revised to completely realign the drawing distribution program. Craft management will be given the responsibility for maintaining craft drawing files and a craft drawing distribution center will be created to coordinate transfer of drawing requests and distribution. The DCU will periodically supply printouts from the Construction Drawing Control System (CDCS) of the drawings assigned to craft personnel for verification of the correct revision. The DCU will also conduct routine reviews of controlled drawing files to assure compliance.

Date When Full Compliance Will Be Achieved

TVA will be in full compliance by August 1, 1983.

RESPONSE TO SEVERITY LEVEL V VIOLATION 50-438, 50-439/83-02-02
SUPPORTS FOR REMOTE OPERATORS

Description of Deficiency

10 CFR 50, Appendix B, Criterion V and the accepted QA Program (TVA-TR75-1A, Revision 5) Section 47.1A.5 require that activities affecting quality be accomplished in accordance with procedures.

TVA's Quality Assurance Program Policy (QAPP 5) Rev. 2, Paragraph B.1 states the following: "Activities affecting quality including quality assuring and verifying shall be prescribed and accomplished in accordance with documented instructions, procedures, or drawings."

Contrary to the above, during the weeks of January 3 and January 10, 1983, activities affecting quality were accomplished without documented procedures in that supports for remote valve operators were being installed or had been installed by the millwright craft for safety-related valves 2NB-VDAC-105, ONB-VJAC-196-N and ONB-VJAC-201-N without approved procedures, instructions or drawings. (Unit 1 and 2)

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reasons for the Violation

The violation occurred because the responsible hanger engineering unit personnel failed to follow procedure BNP-QCP-6.13, Seismic Support Modification, in an effort to expedite work. The procedure required interim approval of the support drawing from the onsite Division of Engineering Design (EN DES) engineer prior to release of the support for fabrication and installation. This interim approval had not been received.

Corrective Steps Taken and Results Achieved

The installation of the cited supports was discontinued until the support drawings were approved on an interim basis, which has now been accomplished.

Corrective Steps Taken to Avoid Further Violation

All applicable hanger engineering unit personnel have been retrained in the requirement to receive interim approval from EN DES on preliminary support drawings prior to release of supports for fabrication and installation.

Date When Full Compliance Will Be Achieved

TVA is now in full compliance.