## TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

83 SEP 16 P 1: 40

September 15, 1983

BLRD-50-438/82-14 BLRD-50-439/82-14

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 - IMPROPER USE OF FOAM PLASTIC INSULATION ON STAINLESS STEEL PIPE - BLRD-50-438/82-14, BLRD-50-439/82-14 - SIXTH INTERIM REPORT

The subject deficiency was initially reported to NRC-OIE Inspector R. V. Crlenjak on February 3, 1982 in accordance with 10 CFR 50.55(e) as NCR BLN BLP 8203. This was followed by our interim reports dated March 5, June 1, September 7 and December 10, 1982 and March 21, 1983. Enclosed is our sixth interim report. Please note that a five-day delay of our submittal was discussed with P. E. Fredrickson on September 14, 1983. We expect to submit our next report by October 17, 1984.

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

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

Records Center (Enclosure)
Institute of Nuclear Power Operations
1100 Circle 75 Parkway, Suite 1500
Atlanta, Georgia 30339

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## ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2

IMPROPER USE OF FOAM PLASTIC INSULATION ON STAINLESS STEEL PIPE

NCR BLN BLP 8203

BLRD-50-438/82-14, BLRD-50-439/82-14

10 CFR 50.55(e)

SIXTH INTERIM REPORT

## Description of Deficiency

During the process of a design review, a deficiency was discovered in the use of foam plastic insulation on stainless steel pipe. Foam plastic insulation cannot be purchased to meet the requirements for chloride and fluoride content for use on stainless steel pipe as defined by Regulatory Guide 1.36.

This deficiency resulted from the use of two instructional documents by designers which specify foam plastic insulation to be used on cold water piping without distinction to stainless steel (refer to memorandum from R. G. Pratt to Bellefonte Design Project Files dated October 20, 1978, "Bellefonte Nuclear Plant Pipe Insulation" and Mechanical Design Guide DG-M18.9.1 R1). The designers used these documents in preparing pipe insulation drawings, seismic analysis modes, and pipe insulation procurement drawings. Accordingly, some drawings were released incorrectly calling for the foam plastic insulation on stainless steel pipe. This deficiency is applicable only to Bellefonte Nuclear Plant. The material has been procured, but none has been installed.

## Interim Progress

TVA has not yet completed the revision of the unit 1 seismic analysis drawings discussed in our previous report. In addition, some seismic reanalysis is required for unit 2 supports. This work has been scheduled in conjunction with other unit 2 analysis work. Consequently, TVA will provide a final report upon completion of the unit 2 reanalysis work.