TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

May 21, 1984 MAY 24 A 9:20

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 VIOLATION 50-438/84-09-01, 50-439/84-09-01 - FAILURE TO PROPERLY EVALUATE AND CLASSIFY NCR 1885 AS SIGNIFICANT AND REPORTABLE TO THE NRC

This is in response to R. C. Lewis' letter dated April 29, 1984, report numbers 50-438/84-09, 50-439/84-09 concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations. 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

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

ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO SEVERITY LEVEL IV VIOLATION
50-438/84-09-01, 50-439/84-09-01
FAILURE TO PROPERLY EVALUATE AND CLASSIFY NCR 1885 AS
SIGNIFICANT AND REPORTABLE TO THE NRC

Description of Deficiency

10 CFR 50, Appendix B, Criterion V, as implemented by Bellefonte PSAR Section 17.1A.5, requires in part that activities affecting quality shall be prescribed by documented instructions, procedures, and drawings and shall be accomplished in accordance with these instructions, procedures, and drawings. Procedures BNP QCP 10.4, EN DES-EP 1.26 and EN DES-EP P2.02 require that nonconformances be evaluated for significance and reportability to the NRC under 50.55(e) criteria. Procedures BN-QCP-10.4, R10 and EN DES-EP 1.26 indicate an item shall be classified as significant if it requires or meets one or more of the following:

a. Any item or condition requiring extensive redesign, repair, or rework.

b. Any item or condition which if uncorrected, could adversely affect the safety of operations of the plant, or could have generic implications at other TVA nuclear plants.

c. Repetitions of a particular nonconformance. Repetitious nonconformances for an activity where a small rejection rate is considered normal or administrative matters such as late arrival of records from suppliers may not necessarily require upgrading unless the nonconformances are numerous.

Contrary to procedure requirements, nonconformance number 1885 involving numerous failures of 3/4" expansion shell anchors in the Control Building M and P line walls was not classified as significant. Failure of the expansion shell anchors will require extensive rework. Failure of the anchors could lead to failure of safety systems being supported by the anchors. The failure of the expansion anchors is a repeat of the same problem identified in nonconformance number 1381. Nonconformance number 1381 which also involved numerous failures of expansion shell anchors in the M and P line walls of the Control Building was classified as significant and was reported to NRC Region II as reportable under 10 CFR 50.55(e) criteria.

TVA Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reason for the Violation

Nonconformance Report (NCR) 1381 was initiated on February 13, 1981, as a result of a high rate of anchor failure in a Control Building wall. TVA Construction Engineer's Organization evaluated this NCR and determined it to be nonsignificant based on the information available at that time. However, after performance of additional testing and completion of the investigation required to determine the cause of the failure of the self drilling anchors (SSD), TVA's Division of Engineering Design (EN DES) upgraded the NCR to significant on March 9, 1981. Corrective action based upon the data in the NCR investigation resulted in the replacement of all 3/4" SSD anchors in the area of high failure only. This work was completed by BLN-QCP-10.6, "Work Releases," and the NCR was closed.

On July 13, 1982, NCR 1885 was written to identify additional high rates of anchor failures in other portions of the Control Building wall and because no open NCR existed. As a result of NCR 1381, TVA Construction Engineer's Organization determined this NCR to be nonsignificant based on the knowledge that this previously identified problem could be corrected utilizing the corrective action previously specified. Subsequently, EN DES agreed that this NCR was nonsignificant and concurred with TVA's Division of Construction (CONST) corrective action specified in the NCR.

3. Corrective Steps Taken and Results Achieved

Although TVA failed to properly evaluate and classify the significance and reportability of NCR 1885, the concern outlined in NCR 1885 was addressed and the anchors are currently being replaced. NCR 1885 has been upgraded to a significant condition and reported to the NRC under the requirements of 10 CFR 50.55(e).

4. Corrective Steps Taken to Avoid Further Noncompliance

Bellefonte Nuclear Plant Quality Control Procedure (BNP)-(QCP)-2.8, R13, "Bolt Anchors Set in Hardened Concrete," has been revised to prohibit any future installation of SSD anchors in concrete walls in pour number C7-3a, which includes all areas identified as exhibiting high anchor failure in NCRs 1381 and 1885. BNP-QCP-10.4, R10, "Control of Nonconformances," which required the review for significance by the Construction Engineer's Organization, has now been changed to require review by an independent member of the Quality Manager's Organization. This review change has aided in a better check and balance to assure proper significance review of NCRs. BNP-QCP-10.41, "Trend Analysis Program," has been generated to assist in providing an indicator to organizations as to where project management quality level objectives are met and for determining specific areas needing investigation and/or improvement when these objectives are not met.

5. Date When Full Compliance Will Be Achieved

TVA is now in full compliance.