

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

January 19, 1984

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 - SUPPLEMENTAL INFORMATION FOR VIOLATIONS 50-438/83-24-01, 50-439/83-24-01 - QUESTIONABLE ULTRASONIC EXAMINATIONS - 50-438/83-24-02 - THE ACTION TO PRECLUDE RECURRENCE STATED IN NCR 2089 HAS NOT BEEN IMPLEMENTED

TVA had submitted a November 15, 1983 response to R. C. Lewis' letter dated October 17, 1983, report numbers 50-438/83-24, 50-439/83-24, concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations.

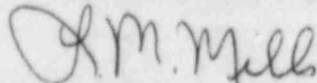
During a TVA/NRC teleconference on December 20, 1983 questions and concerns were raised by NRC-Region II inspectors regarding the subject violations. The enclosed supplemental information should adequately clarify and address the concerns raised by NRC-Region II in regard to TVA's November 15, 1983, response to the above subject violations.

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 (Enclosure):

Mr. Richard C. DeYoung, Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Records Center  
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  
SUPPLEMENTAL INFORMATION FOR SEVERITY LEVEL IV VIOLATION  
50-438/83-24-01, 50-439/83-24-01  
QUESTIONABLE ULTRASONIC EXAMINATIONS

Items 1 and 7

G-29M Process Specification 3.M.7.1, "Specification for Ultrasonic Examination of Weld Joints," will be revised to include more detailed information regarding calibration, recalibration, and the use of transfer techniques. This revision to the G-29M Process Specification 3.M.7.1, coupled with the retraining of ultrasonic testing inspection personnel in the proper method of completing the ultrasonic testing, and the incorporation of this method into the training program at the Nondestructive Examination (NDE) Training Center at Watts Bar Nuclear Plant, will assure that all future ultrasonic testing personnel will be consistent in the completion of this type of test report.

Items 2 and 3

Item 2 stated that the ultrasonic testing procedure did not designate any documented limit or other criteria to assure that the ASME Section V, Article 5 Code specified maximum scanning rate of 6 in/sec was not exceeded. There is no requirement that the 6 in/sec scan rate be a part of the procedure. The maximum specified scan rate is taught to all Level I and Level II ultrasonic testing inspection personnel at our NDE Training Center at Watts Bar Nuclear Plant as part of their certification training. We have considered this adequate to meet the code.

Item 3 states that neither the procedure nor the records indicate requirements for a performance of rechecks of calibration and that such rechecks are needed to assure maintenance of calibration.

Neither ASME Section V nor our procedures require rechecks or post-calibration following examination; however, we do periodically check the integrity of the calibration in process of examination by the use of a portable "rompas" field calibration block as a matter of good practice.

Although TVA still maintains that our program meets minimum Code requirements, we do agree with NRC-Region II that our program would be improved by revising the G-29M Process Specification 3.M.7.1 to include scanning rate limitations, detailed information regarding calibration (recalibration), the use of transfer techniques, and calibration rechecks. Changes to the G-29M Process Specification will be completed by March 15, 1984. Also, construction ultrasonic testing procedure QCP 7.2 will be revised to include the G-29M changes by January 1, 1985.

Violation 438/83-24-02 - The Action to Preclude Recurrence Stated in NCR 2089 Has Not Been Implemented

Although lead sealing of valves was listed as recurrence control in L. S. Cox's memorandum to R. M. Hodges dated May 26, 1983 specifying actions to prevent recurrence for NCR 2089, TVA never intended for this to be a program requirement. During preparation of the recurrence control memorandum, the responsible engineer questioned mechanical quality control personnel regarding their practices for possible inclusion in the report. Even though lead sealing of valves was a current practice, it should not have been provided as a recurrence control for NCR 2089. Upon TVA realizing that the NRC inspector had interpreted the statement differently, and that TVA apparently had miscommunicated our intent, a memorandum was immediately issued to clarify TVA's position and eliminate the statement as recurrence control to ensure that the intended results of this statement were achieved.