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

July 13, 1984

U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Dear Mr. O'Reilly:

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2 - SUPPLEMENTAL RESPONSE TO VIOLATION 50-438/83-05-03, 50-439/83-05-03 - FAILURE TO FOLLOW PROCEDURES AND DRAWINGS FOR INSPECTION OF MECHANICAL EQUIPMENT

While conducting a final review of corrective action for this violation, TVA identified certain anomalies. These were discussed with NRC-OIE Inspector P. E. Fredrickson on June 27, 1984, at which time we also indicated that the date of July 1, 1984 for completion of corrective actions indicated in our final report would not be met. Enclosed are the details concerning this issue.

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

D S Kammer

for 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

ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2
SUPPLEMENTAL RESPONSE TO SEVERITY LEVEL V VIOLATION
50-438/83-05-03, 50-439/83-05-03
FAILURE TO FOLLOW PROCEDURES AND DRAWINGS FOR
INSPECTION OF MECHANICAL EQUIPMENT

Description of Deficiency

The subject violation resulted from inspections performed by the NRC Construction Appraisal Team (CAT), and involved discrepancies identified with certain mechanical equipment which appeared to have been inspected and accepted by mechanical quality control (QC). The initial response to the violation committed Bellefonte Construction to reinspect all equipment presently accepted under revisions 0 and 1 of Bellefonte Nuclear Plant Quality Control Procedure (BNP-QCP) 6.3, "Mechanical Equipment." Any discrepancies found were to be documented and corrected in accordance with site procedure. Resolution of the subject violation required completion of the reinspections, correcting the discrepancies identified and closure of documentation, including nonconformance report 2346. These actions have been completed.

During a final review of corrective actions for this violation, certain anomalies were identified. A review of the CAT inspection report identified concerns involving the lack of specific requirements or reference to source documents in BNP-QCP-6.3, which would enable the QC inspector to establish proper acceptance criteria and the need for clarification of thermal expansion provisions. A review of QC inspection results has supported the conclusion that essentially all discrepancies were related to either foundation attachment hardware or attributes linked to thermal expansion provisions. Although the violation response committed TVA to a full reinspection, inadequate communication in mechanical QC limited the effort to verification of correct foundation hardware, which was the major problem identified by the CAT inspectors.

Based on this information, certain new corrective actions must be initiated and completed to consider TVA in full compliance with respect to the violation. BNP-QCP-6.3 presently requires two stages of inspection for mechanical equipment, as indicated in the CAT report. "Equipment Installation Inspection" (Test 81), covers foundation hardware, except when the equipment contains thermal expansion devices. Final verification is then provided by, "Prior to Construction Test Equipment Inspection" (Test 84). All equipment identified as discrepant by the CAT inspectors contained thermal expansion devices and none had received the test 84 inspection. The new corrective actions to be taken are:

1. Site mechanical engineering is currently revising BNP-QCP-6.3, to provide clarifications involving the CAT inspector concerns, which includes a listing of attributes to be inspected on thermal expansion devices.

2. Increased training will be provided to QC inspectors involving the use of Division of Engineering Design/vendor acceptance criteria.

3. Mechanical QC will then reinspect equipment which has previously been inspected and accepted under the test 84 inspection. Any additional discrepancies will be documented and corrected in accordance with site procedure.

These new corrective actions will be completed and full compliance will be achieved by November 30, 1984.