

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

84 SEP 29 1984
September 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 30323

Dear Mr. O'Reilly:

BELLEFONTE NUCLEAR PLANT UNIT 1 - RESPONSE TO VIOLATION
50-438/84-15-01 - FAILURE TO FOLLOW PROCEDURE FOR INSPECTING FOR FLOOR
PENETRATIONS

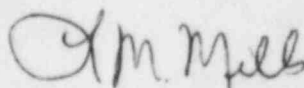
This is in response to D. M. Verrelli's letter dated August 23, 1984,
report numbers 50-438/84-15, 50-439/84-15 concerning activities at the
Bellefonte Nuclear Plant which appeared to have been in violation of NRC
regulations. Enclosed is our response to the citation.

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

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ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNIT 1
RESPONSE TO SEVERITY LEVEL V VIOLATION
50-438/84-15-01

FAILURE TO FOLLOW PROCEDURE FOR INSPECTING FOR FLOOR PENETRATIONS

Description of Deficiency

10 CFR 50, Appendix B, Criterion V, as implemented by Bellefonte FSAR Section 17, paragraph 17.1A.5, requires that activities affecting quality be accomplished in accordance with documented procedures and drawings. Bellefonte quality control procedure (QCP) 6.1, paragraph 6.1, requires the responsible Mechanical Engineering Unit representative to inspect embedded sleeves and piping during and after the installation activity for general conformance with detailed design drawings. Drawing No. 3AW-0594-PT-07, Rev. 9, shows the location of floor penetrations (sleeves).

Contrary to the above, activities affecting quality were not accomplished in accordance with QCP-6.1 and drawing 3AW-0594-PT-07 Rev. 9 in that four floor penetrations required by the drawing were not added in two concrete pours, card Nos. 9281 and 9385, and these pours were accepted by the Mechanical Engineering Unit.

TVA Response

Admission or Denial of the Alleged Violation

TVA denies the alleged violation. The violation references drawing 3AW0594-PT-07, Rev. 9, as the controlling document which specified the mark Nos. 1551 and 1552 sleeves. The mark Nos. 1551 and 1552 sleeves were added to the mechanical sleeve tables on December 23, 1978, upon issue of 3AW0594-PT-07, Rev. 7. The concrete inspection records were signed on August 26 and October 10, 1977. The embedded piping and sleeves were properly inspected in accordance with Bellefonte QCP-6.1.

This alleged violation resulted from an additional review of unresolved item 50-438/81-11-02, "Floor Penetration." The initial concern identified in the unresolved item involved core drilled holes being made in the concrete floor slab in lieu of pipe sleeves, which were specified in drawing 3AW0594-PT-07, Rev. 9.

The installation of the core drilled holes was accomplished in accordance with approved procedures. TVA's Office of Engineering (OE) approval of the core drilled holes was obtained by initiation of field change requests (FCRs) 0-1786, 0-1836 and 0-2014, which were written to revise the Auxiliary Building concrete drawing (4AW0322-X1-3). The actual drilling was authorized by work releases 2251 and 5033.

A subsequent investigation by OE regarding the sealing of penetrations identified the need to install sleeves around the core drilled holes. FCR M-5103 was initiated to authorize the revised sleeve installation. The drawing has been revised as specified by FCR M-5103, the sleeves have been installed, and FCR M-5103 has been closed.