

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

September 19, 1984

84 SEP 25 P 3:43

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:

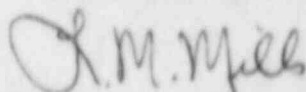
BELLEFONTE NUCLEAR PLANT UNIT 1 - SECOND REVISED RESPONSE TO VIOLATION
50-438/84-04-02 FAILURE TO DOCUMENT A CONDITION WHICH IS ADVERSE TO QUALITY

Enclosed is TVA's second revised response to the subject violation. This revision is in response to a TVA/NRC telecon on September 6, 1984. TVA's previous responses to D. M. Verrelli's letter dated March 22, 1984 were submitted on May 10 and June 20, 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 UNIT 1
SECOND REVISED RESPONSE TO SEVERITY LEVEL V VIOLATION
50-438/84-04-02
FAILURE TO DOCUMENT A CONDITION WHICH IS ADVERSE TO QUALITY

Description of Deficiency

10 CFR 50.54(a)(1) requires the licensee to implement the quality assurance program described in TVA Topical Report TVA-TR-75-1A. Section 17.2.5 of the report requires that activities affecting safety-related functions be conducted in compliance with the Office of Power procedures. Procedure BLA 16.1, Identification of Conditions Adverse to Quality and Corrective Action, requires documentation of conditions adverse to quality within three working days of identification of the condition and specifies the manner of documentation.

Contrary to the above, by March 2, 1984, a condition adverse to quality, froth on the station batteries, had not been documented in accordance with BLA 16.1 although it had been identified in September 1981.

TVA Response

1. Admission or Denial of the Alleged Violation

TVA denies the violation of procedure BLA 16.1 occurred as stated. However, TVA does admit a violation in that the condition should have been documented on a TVA Division of Construction (CONST) Quality Control Investigation Report (QCIR) in accordance with Bellefonte Nuclear Plant Quality Control Procedure (BNP-QCP) 10.26 before receipt of formal documentation which confirmed that a condition adverse to quality did not exist.

2. Reasons for the Violation

In September 1981, TVA's Division of Nuclear Power (NUC PR) personnel identified a frothing condition in the unit 1 station batteries. CONST personnel were notified of this condition because the batteries had not been transferred to the plant operations division (i.e., NUC PR). NUC PR personnel were concerned because the presence of the froth could impede the visual examination of electrolyte level in the batteries, which is a maintenance requirement. The responsible CONST engineer informally contacted TVA's Office of Engineering (OE) and the vendor, C&D Batteries Division, shortly after identification of the condition, but sometime before receipt of the C&D letter dated February 10, 1982. Initial response from these parties indicated that the frothing was not a condition adverse to quality and would not result in any deleterious affects to the batteries.

The responsible CONST engineer made an incorrect decision regarding documentation of the frothing condition, in that the informal information provided was considered to be adequate such that initiation of a QCIR was not required. BNP-QCP-10.26, R4, "Quality Control Investigation Reports," which was in effect in September 1981, required that any information, irregularity, or suspected deficient equipment which could result in a nonconformance should be reported immediately for prompt investigation and evaluation in accordance with the procedure.

3. Corrective Steps Taken and Results Achieved

Upon identification of a potential violation by the NRC Inspector, CONST initiated nonconformance report (NCR) 2856, which described the froth and requested evaluation of the condition by OE and the vendor. The OE response reiterated all previous statements in that it indicated the froth should be removed as necessary to prevent interference with normal maintenance procedures. NCR 2856 was closed on June 8, 1984. (However, after NCR 2856 was closed, the vendor notified TVA that the battery cells would be replaced due to the problems with the "riegel wrap" retainer material. TVA reported this condition under 10 CFR 50.55(e) on August 22, 1984, as NCR BLN EEB 8416.)

4. Corrective Steps Taken to Avoid Further Violations

TVA considers the incorrect decision made by the responsible CONST engineer to be an isolated occurrence; therefore, no further action is required.

5. Date When Full Compliance Will Be Achieved

TVA is currently in full compliance.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

SEP 10 1984

Tennessee Valley Authority
ATTN: Mr. H. G. Parris
Manager of Power and Engineering
500A Chestnut Street Tower II
Chattanooga, TN 37401

Gentlemen:

SUBJECT: REPORT NOS. 50-438/84-04 AND 50-439/84-04

Thank you for your responses of May 10 and June 20, 1984, to our Notice of Violation issued on March 22, 1984, concerning activities conducted at your Bellefonte facility. We have evaluated your responses and found that they meet the requirements of 10 CFR 2.201. We have discussed this response with your staff and agreed that a supplemental response will be issued. Per a telephone conversation between T. E. Conlon and R. H. Shell on September 5, 1984, the supplemental will be submitted by September 29, 1984.

We appreciate your cooperation in this matter.

Sincerely,

David M. Verrelli, Chief
Reactor Projects Branch 1
Division of Reactor Projects

cc: E. Condon, Bellefonte Nuclear
Plant Engineering Coordinator
A. M. Qualls, Plant Manager
J. W. Anderson, Manager
Office of Quality Assurance
H. N. Culver, Chief, Nuclear Safety
Staff
W. R. Brown, Jr., Bellefonte Nuclear
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