

10

**TENNESSEE VALLEY AUTHORITY**

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

June 20, 1984

25 P I : 08

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 - REVISED RESPONSE TO VIOLATION  
50-438/84-04-02 FAILURE TO DOCUMENT A CONDITION WHICH IS ADVERSE TO QUALITY

In response to D. M. Verrelli's letter dated March 22, 1984, report numbers 50-438/84-04, 50-439/84-04 concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations, TVA submitted our position in a letter dated May 10, 1984. In accordance with the TVA/NRC telecon of June 1, 1984, we are now submitting the enclosed revised 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

*D S Kammer*

D. S. Kammer  
Nuclear Engineer

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

8411080333 841031  
PDR ADDCK 05000438  
Q PDR

ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNIT 1  
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.

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 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 Division of Engineering Design (EN DES) 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 EN DES and the vendor. The EN DES 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.

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.