

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

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October 22, 1984

BLRD-50-438/82-14  
BLRD-50-439/82-14

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:

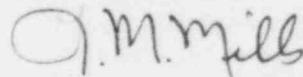
BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2 - IMPROPER USE OF FOAM PLASTIC  
INSULATION ON STAINLESS STEEL PIPE - BLRD-50-438/82-14, BLRD-50-439/82-14 -  
SEVENTH INTERIM REPORT

The subject deficiency was initially reported to NRC-OIE Inspector R. V. Crlenjak on February 3, 1982 in accordance with 10 CFR 50.55(e) as NCR BLN BLP 8203. This was followed by our interim reports dated March 5, June 1, September 7 and December 10, 1982 and March 21 and September 15, 1983. Enclosed is our seventh interim report. We expect to submit our next report by June 19, 1985.

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 UNITS 1 AND 2  
IMPROPER USE OF FOAM PLASTIC INSULATION ON STAINLESS STEEL PIPE  
NCR BLN BLP 8203  
BLRD-50-438/82-14, BLRD-50-439/82-14  
10 CFR 50.55(e)  
SEVENTH INTERIM REPORT

Description of Deficiency

During the process of a design review, a deficiency was discovered in the use of foam plastic insulation on stainless steel pipe. Foam plastic insulation cannot be purchased to meet the requirements for chloride and fluoride content for use on stainless steel pipe as defined by Regulatory Guide 1.36.

This deficiency resulted from the use of two instructional documents by designers which specify foam plastic insulation to be used on cold water piping without distinction to stainless steel (refer to memorandum from R. G. Pratt to Bellefonte Design Project Files dated October 20, 1978, "Bellefonte Nuclear Plant Pipe Insulation" and Mechanical Design Guide DG-M18.9.1 R1). The designers used these documents in preparing pipe insulation drawings, seismic analysis modes, and pipe insulation procurement drawings. Accordingly, some drawings were released incorrectly calling for the foam plastic insulation on stainless steel pipe.

Interim Progress

TVA's Office of Engineering (OE) has revised the instructional memorandum to indicate the types of insulation compatible with Regulatory Guide 1.36. A similar revision to the mechanical design guide is complete. Revised pipe insulation drawings, seismic analysis modes, and procurement drawings have been issued. Seismic analysis drawings are being revised by design change request (DCR) 2195 in accordance with engineering change notice (ECN) 1396.

The seismic analyses for this deficiency are in process and supports are to be redesigned. A final report on this item will be submitted when the design rework is complete.