

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

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July 6, 1981

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Enclosed is our response to R. C. Lewis' June 4, 1981 letter to H. G. Parris transmitting Inspection Report Nos. 50-518/81-08, -519/81-08, -520/81-08, and -521/81-08 regarding activities at our Hartsville Nuclear Plant which appeared to have been in violation of NRC regulations. If you have any questions, please call Jim Damer at FTS 857-2014.

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 Regulation and Safety

Enclosure

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ENCLOSURE

HARTSVILLE NUCLEAR PLANT
RESPONSE TO NRC-OIE LETTER FROM
R. C. LEWIS TO H.G. PARRIS DATED JUNE 4, 1981

Reference: Report Nos. 50-518/81-08, -519/81-08, -520/81-08,
-521/81-08

This report responds to the Notice of Violation described in Appendix A of the OIE inspection report referenced above. This is our final report on this item of noncompliance.

Noncompliance Item - Severity Level V - Violation 50-518 / 81-08-01

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documented procedures and instructions and shall be accomplished in accordance with these procedures and instructions. Attachment C to procedure QAP 15.1 in the TVA Division of Construction Program QA Manual requires TVA NCR's to be written within approximately three working days of identification of a defect or deficiency.

Contrary to the above:

- A. Hartsville site procedure CEP 15.03, "Control of Nonconformances" does not address the timeliness of identification requirements stated in QAP 15.1 of the TVA Division of Construction Program QA Manual.
- B. The omission of anchor rods and stiffener plates from the A-1 reactor building drywell frame 10 was discovered in December 1980 and was not identified as an NCR on nonconformance report HMPA-141 until May 5, 1981.

This is a Severity Level V Violation (Supplement II.E).

RESPONSE

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. The Reasons for the Violation

- A. The timeliness requirement was overlooked by both the writer of CEP-15.03 and those involved in the review of procedures.
- B. The omitted anchor rods were to be added to a vendor supplied embedment. This addition was overlooked by engineering, inspection, and craft personnel. The delay in identifying this as an NCR condition was due to the evaluation of proposed dispositions. At the time of this occurrence there was no timeliness requirement included in the procedure for handling NCR's.

3. Corrective Steps Taken and Results Achieved

- A. CEP-15.03 was revised on May 14, 1981 to include the requirement for writing the NCR within three working days of the identification of the deficiency.
- B. The condition identified in NCR HNPA-141 was being investigated. As stated in the inspection report, the NCR has been written and documents the disposition and corrective action.

4. Corrective Steps Taken to Avoid Further Noncompliance

- A. The corrective steps taken in paragraph 3.A above will prevent a recurrence of this problem.
- B. The policy established by the revision of CEP-15.03 will preclude the practice of performing lengthy investigations before identifying the deficient condition. This restriction has been reinforced by a reminder sent to all engineering supervisory personnel.

5. Date When Full Compliance Was Achieved

TVA has been in full compliance since the issuance of the revision to CEP-15.03 on May 14, 1981.