

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

March 30, 1982

410.20

U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

BELLEFONTE NUCLEAR PLANT UNIT 1 - RESPONSE TO VIOLATION 50-438/82-02-12 -
PREREQUISITES FOR CONSTRUCTION FLUSH

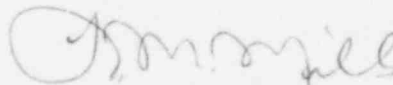
This is in response to F. S. Cantrell's letter dated March 3, 1982, report numbers 50-438/82-02, 439/82-02, concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations. Enclosed is our response to the citation.

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 Regulation and Safety

Enclosure

cc: Mr. Richard C. DeYoung, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNIT 1 PREREQUISITES FOR CONSTRUCTION FLUSH SEVERITY LEVEL V VIOLATION 50-438/82-02-12

Description of Violation

10 CFR 50, Appendix B, Criterion XI, and Tennessee Valley Authority (TVA) Final Safety Analysis Report, Section 17.1A.9, requires that: Test procedures shall include provisions for assuring that all prerequisites for the given test have been met. Test results shall be documented and evaluated to assure that test requirements have been satisfied.

Bellefonte's Construction Test Procedure BNP-CPT-6.1, Revision 0, requires that the Startup Testing and Coordination Unit (STCU) shall be responsible for verification of completion of cleaning and flushing activities and ensuring all documentation has been accomplished as specified by individual system/subsystem procedures. A construction test procedure package is developed for each system or portion of a system to be cleaned. This package contains the instructions for accomplishing the individual system cleaning and also the required documentation and verification of completion of each system cleaning activity.

Contrary to the above, on January 3, 1982, the test director was performing the spent fuel coolant pump 1A-A (NMFA) flush without the required QC/engineering hold points to the flush procedure being signed.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for the Violation

The violation occurred as the result of failure to follow Construction Test Procedure BNP-CPT-6.1 by the flush test director. It should be noted that only one of the cited hold points was a valid QA inspection point which required verification of valve lineup in the system. The verification of the power valve lineup was performed by the responsible QC personnel and found to be acceptable; however, the documentation signoff was not immediately performed. The remaining cited steps were required only to maintain an accurate flush status but should have been verified.

Corrective Action Taken and Results Achieved

The individual system flush documentation package was signed off to accurately reflect the flush status almost immediately after the resident inspector noted the deficiency. The flush continued as required, and all portions of the flush completed to date are valid and acceptable procedurally. All applicable startup and testing unit personnel have been reindoctrinated in the requirements for and responsibilities of the flush test director, with an emphasis on signature verification of documentation steps as completed.

The reindoctrination was performed on January 11, 1982 and on February 22, 1982.

Corrective Steps Taken to Avoid Further Violations

Spot checks during ongoing system flushes by the test director supervisor are performed to ensure compliance with the test procedure. Flushes performed since the violation occurred, including the cited flush, have proceeded in accordance with the established test procedure.

Date of Full Compliance

TVA was in full compliance on February 22, 1982.