

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

June 1, 1982

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, Suite 3100

Atlanta, Georgia 30303

Dear Mr. O'Reilly:

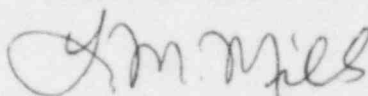
BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2 - IMPROPER USE OF FOAM PLASTIC
INSULATION ON STAINLESS STEEL PIPE - BLRD-50-438/82-14, BLRD-50-439/82-14 -
SECOND INTERIM REPORT

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 first interim report dated
March 5, 1982. Enclosed is our second interim report. We expect to submit
our next report by September 8, 1982.

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 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 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)
SECOND 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 in safety-related systems. 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 TVA 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. This deficiency is applicable only to Bellefonte Nuclear Plant. The material has been procured, but none has been installed.

Interim Progress

TVA has initiated a revision to the instructional memorandum to indicate types of insulation compatible with Regulatory Guide 1.36. A similar revision to the mechanical design guide has also been initiated. Pipe insulation drawings, seismic analysis modes, procurement drawings, and other affected drawings are being revised to comply with the revised instructions in accordance with engineering change notice (ECN) 1396.