TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

December 28, 1982

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 - RESPONSE TO VIOLATION 50-438, 50-439/82-30-01 - FAILURE TO PROMPTLY DETERMINE AND DOCUMENT THE ACTION TAKEN TO PREVENT RECURRENCE OF A SIGNIFICANT DEFICIENCY REPORTED BY CDR 439/81-23, 438/82-16

This is in response to D. M. Verrelli's letter dated November 29, 1982, report numbers 50-438/82-30, 50-439/82-30, 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 Licensing

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

ENCLOSURE
BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO SEVERITY LEVEL V VIOLATION 50-438, 50-439/82-30-01
FAILURE TO PROMPTLY DETERMINE AND DOCUMENT THE ACTION TAKEN TO PREVENT RECURRENCE OF A SIGNIFICANT DEFICIENCY REPORTED BY CDR 439/81-23, 438/82-16

Description of Deficiency

10 CFR 50, Appendix B, Criterion V, as implemented by Bellefonte FSAR Section 17.1A.5, requires in part that activities affecting quality shall be prescribed by documented instructions, procedures or drawings and shall be accomplished in accordance with these instructions, procedures and drawings. TVA procedure OEDC 15 QAI-1, Rev. 1, "Determining, Reporting and Correcting Conditions Adverse to Quality," requires action to prevent recurrence of significant conditions adverse to quality be promptly determined and documented.

Contrary to the above, action to prevent recurrence of the significant condition reported by CDR 50-439/81-23 and 50-438/82-16, Lack of Rebar at Main Steam Flued Head, was not determined until 13 months after the item was identified and was not completed and documented until 15 months after the item was identified.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for the Violation

The significant condition reported by CDR 50-439/81-23, 50-438/82-16 will be hereafter referred to as nonconformance report (NCR) 1390. TVA failed to promptly determine actions required to prevent recurrence (ARPR) because a firm identification of the cause of NCR 1390 could not be realized. TVA's Division of Construction (CONST) and Division of Engineering Design (EN DES) could not agree on the actual cause of NCR 1390 and this problem was compounded by the fact that the deficient construction had occurred a considerable period of time before it was discovered. Although CONST had identified proposed ARPR on NCR 1390 the same day NCR 1390 was initiated, concurrence by EN DES was not achieved until nearly one year later. The individual responsible for carrying out CONST's proposed ARPR has stated that he did in fact complete those actions within one month after initiation of NCR 1390. However, he failed to follow procedures by documenting completion of the task and therefore TVA can not provide any objective evidence that ARPR were completed promptly.

Corrective Action Taken and Results Achieved

The completion of action taken to prevent recurrence for NCR 1390 was properly documented as stated in the inspection report. The civil inspectors were instructed to report installation conflicts between embedments and rebars to the construction engineer for coordinated modifications with the design organization. This instruction was documented in accordance with BNP-QCP-IC.29, Quality Assurance Training Program.

OEDC QA document, OEDC-QAI-4 Revision 1, governed handling of conditions adverse to quality (CAQ) at the time NCR 1390 was processed. The procedure required that the action be taken promptly. The procedure was revised on April 22, 1981 to provide explicit instructions regarding determination of action required to prevent recurrence. Promptly is defined as "to provide immediate documentation of the identified CAQ and the cause and then expeditiously effect action within the following limits:

1. The investigation of a CAQ shall be completed within 60 days.

2. Action to prevent recurrence except when procurement is involved shall be complete within 6 months."

OEDC-QAI-4 has since then been remembered to OEDC 15 QAI-1.

Steps Taken to Avoid Further Violations

A policy directive was issued from G. H. Kimmons, Manager of Engineering Design and Construction, on July 21, 1982, which provided specific guidance and responsibility designations regarding timeliness and responsiveness in resolving and reporting conditions adverse to quality.

A memorandum was issued from G. H. Kimmons on December 1, 1982, which emphasized the lack of timeliness regarding prompt resolution of identified problems and corrective actions. The memorandum stated that personnel should be directed to give a much higher priority to promptly correct identified problems and resolve them so that the same problem does not recur and identify specific actions to ensure improvement.

In addition, a memorandum was issued on December 27, 1982 from the site construction engineer to all applicable personnel which emphasizes the importance of providing proper documentation of completion of action taken to prevent recurrence of significant nonconformances.

Date of Full Compliance

TVA is now in full compliance.