

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

July 22, 1982

BLRD-50-438/81-44

BLRD-50-439/81-46

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 - SECONDARY CONTAINMENT  
MODIFICATIONS - BLRD-50-438/81-44, BLRD-50-439/81-46 - FINAL REPORT

The subject deficiency was initially reported to NRC-OIE Inspector D. Quick on July 10, 1981 in accordance with 10 CFR 50.55(e) as NCR BLN QAB 8102. This was followed by our interim reports dated August 7 and October 5, 1981 and February 22, 1982. Enclosed is our final report.

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*

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, DC 20555

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REGIONAL OFFICE  
ATLANTA, GEORGIA

## ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2  
SECONDARY CONTAINMENT MODIFICATIONS  
BLRD-50-438/81-44, BLRD-50-439/81-46  
10 CFR 50.55(e)  
FINAL REPORT

### Description of Deficiency

Engineering Change Notice (ECN) 1268 was issued by the Bellefonte Design Project (BLP) to raise the secondary containment dome to allow adequate room for economic handling of jacks and equipment required for inservice inspection of the vertical tendons on the primary containment. The intent of Engineering Procedure EN DES-EP 4.02, "Engineering Change Notices - Handling," is to get approval of Thermal Power Engineering (TPE) Branches for changes of this magnitude where they are extensively involved. However, as this procedure is written in a manner that allows various interpretations, approval of Civil and Nuclear Engineering Branches (CEB and NEB) was not solicited.

### Safety Implications

Insufficient ECN review could result in a deficient design change being implemented which could adversely affect safe plant operation.

### Corrective Action

OEDC Audit M81-13 was conducted as a programmatic review of EN DES' review and handling of ECNs in accordance with EN DES-EP 4.02, "Engineering Change Notices - Handling." Numerous ECNs were listed as being deficient for not obtaining the appropriate Thermal Power Engineering Branch (TPE) approval. Action to prevent recurrence of the subject NCR (BLNQAB8102) will be identified by the action to prevent recurrence of OEDC Audit M81-13.

All organizations responsible for any action related to changes required per ECN 1268 are now aware of the change. All changes associated with the ECN have been coordinated with the appropriate branches. The generic implications of this deficiency are being corrected through ECN reviews such as Audit M81-13. Any revision to EN DES-EP 4.02 required to prevent misinterpretation will be addressed as part of the response to Audit M81-13.