

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

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April 22, 1983

U.S. Nuclear Regulatory Commission  
Region II  
Attn: Mr. James P. O'Reilly, Regional Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2 - RESPONSE TO VIOLATIONS  
50-438/83-03-01, 50-439/83-03-01, FAILURE TO PROPERLY CURE CONCRETE  
REPAIR PATCH, 50-438/83-03-02, 50-439/83-03-02, FAILURE TO TRAIN  
ELECTRICAL CRAFT FOREMEN IN APPLICABLE PROCEDURE REQUIREMENTS FOR  
STRUCTURAL STEEL INSTALLATIONS

This is in response to D. M. Verrelli's letter dated March 25, 1983,  
report numbers 50-438/83-03, 50-439/83-03 concerning activities at the  
Bellefonte Nuclear Plant which appeared to have been in violation of NRC  
regulations. Enclosed is our response to the citations.

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*  
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

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## ENCLOSURE

### BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2 RESPONSE TO SEVERITY LEVEL V VIOLATION FAILURE TO PROPERLY CURE CONCRETE REPAIR PATCHES 50-438/83-03-01, 50-439/83-03-01

#### 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, and drawings, and shall be accomplished in accordance with these instruction procedures or drawings.

Quality Control Procedure BNP-QCP 5.4, Revision 3, Concrete Curing and Repairing, requires that concrete be wet cured or sprayed with a membrane curing compound and acceptance of curing be documented.

Contrary to this requirement, no documentation was available to verify that a concrete patch located in the Auxiliary building at elevation 622 on the backside of the wall in a pipe chase area between column lines A6, A7, T and U had been cured.

#### Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

#### Reason for Violation

Inspector failed to document curing on curing report.

#### Corrective Steps Taken and Results Achieved

QCIR NO. 30,619 was written to document that no documentation was on file for this particular repair. Based on visual examination of the repair area, it was evident that curing had not been administered by the craft on the back portion of the repair. This condition was noted on QCIR No. 30,614 and work release No. 41,609 was initiated and the repair was completely removed. Additional chipping was done on this work release to facilitate repair using replacement concrete. On March 29, 1983, the repair was completed using replacement concrete (Pour No. A6-15P(R)). Inspections and documentation of the repair work indicate that this repair is now acceptable.

#### Corrective Steps Taken to Avoid Further Violation

The individual inspector was reinstructed on February 15, 1983, to make sure that curing records will be completed in the future. This was re-emphasized to all unit personnel on March 21 and 31, 1983.

Craft foremen were reinstructed in curing requirements on April 12, 1983.

Also, all grout, drypack, and plastic mortar installation inspection records are compared daily to the curing data sheet to assure curing has been documented.

BNP-QCP 5.4 has been revised to further explain curing documentation. The procedure now states, "Curing of repairs made with replacement concrete shall be documented on Attachment B of this procedure. Curing of repairs utilizing a method other than replacement concrete where a work release has been generated shall be documented on Attachment E of BNP-QCP 5.5."

Date When Full Compliance Was Achieved

BNP-QCP 5.4 was revised on April 11, 1983. Retraining of affected craft personnel was completed April 12, 1983. All required corrective action was completed by April 12, 1983.

RESPONSE TO SEVERITY LEVEL V VIOLATION  
FAILURE TO TRAIN ELECTRICAL CRAFT FORMEN IN APPLICABLE PROCEDURE  
REQUIREMENTS FOR STRUCTURAL STEEL INSTALLATIONS  
50-438/83-03-02, 50-439/83-03-02

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 and drawings and shall be accomplished in accordance with these procedures and drawings.

Quality control procedure BNP-QCP-10.30, Revision 3, Craft Quality Assurance Training, requires craft foremen to be trained in Quality Control Procedures related to their area of responsibility.

Contrary to this requirement, the electricians craft foremen responsible for assembling cable tray hangers have not been trained in the areas of QCP 2.15, Structural Steel Installation, that are applicable to the cable tray hanger installations.

Response

Admission or Denial of Alleged Violation

TVA admits the violation occurred as stated.

Reason for Violation

Quality Control Procedure BNP-QCP 10.30, "Craft Quality Assurance Training" requires craft foremen to be trained in Quality Control Procedures related to their area of responsibility. Attachment C to this procedure, which is used by the Project Training Office to determine procedures by which each discipline craft is trained, did not require the electrical craft to be trained in BNP-QCP 2.15, "Structural Steel Installation." Therefore, a procedural conflict exists, resulting in electrician craft foremen not being trained in BNP-QCP 2.15.

Corrective Steps Taken and Results Achieved

BNP-QCP 10.30, "Craft Quality Assurance Training" will be revised by July 1, 1983, requiring electrician craft foremen to be trained in BNP-QCP 2.15.

Since electrical hangers and stiffeners are QC inspected to the requirements of BNP-QCP 3.7, "Electrical Hangers" and BNP-QCP 2.15, Structural Steel Installation," no further action is required. Any installation errors that were made by craftsmen, as the result of this failure to train electrician craft foremen, were noted and corrected before QC acceptance.

Corrective Steps Taken to Avoid Further Violation

At present, BNP-QCP 10.30 Attachment Cs are being reviewed by the Construction Superintendent's Organization and the Procedures and Training Unit to determine their adequacy. Attachment C will be revised as required as the results of these reviews.

Date When Full Compliance Will be Achieved

Corrective action for this violation will be complete by July 1, 1983.