

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

December 28, 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 VIOLATION  
50-438/83-28-02 - FAILURE TO MAINTAIN HEAT ON ERCW PUMP MOTORS AND RESPONSE  
TO DEVIATION 50-438/83-28-01, 50-439/83-28-01 - FAILURE TO SUBMIT AN FSAR  
REVISION IN A TIMELY MANNER PER CDR FINAL REPORT

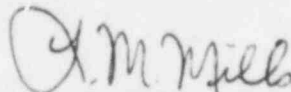
This is in response to R. C. Lewis' letter dated November 29, 1983, report  
numbers 50-438/83-28, 50-439/83-28 concerning activities at the Bellefonte  
Nuclear Plant which appeared to have been in violation of NRC regulations.  
Enclosed is our response to the citations.

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, 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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1983-TVA 50TH ANNIVERSARY

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## ENCLOSURE

### BELLEFONTE NUCLEAR PLANT UNIT 1 RESPONSE TO SEVERITY LEVEL IV VIOLATION 50-438/83-28-02 FAILURE TO MAINTAIN HEAT ON ERCW PUMP MOTORS

#### Description of Deficiency

10 CFR 50, Appendix B, Criterion V, as implemented by TVA Topical Report No. TVA-TR75-1, Revision 5, Section 17.1A.5, requires that activities affecting quality be accomplished in accordance with prescribed instructions, procedures or drawings of a type appropriate to the circumstances. Procedures BNP QCP-1.2, Storage and BNP QCP-1.3, Maintenance require that motor heaters be energized while the motors are in storage.

Contrary to the above, on October 27, 1983, the four (4) ERCW Pump Motor Heaters were found deenergized by each feeder breaker being in the open position.

#### TVA Response

##### 1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

##### 2. Reason for the Violation

The equipment involved in this violation received an operation release on September 24, 1979. An operation release means the operation of this equipment is performed by TVA's Division of Nuclear Power (NUC PR) at the request of TVA's Division of Construction (CONST) in support of construction test activities. Maintenance of this equipment, however, continues to be performed by CONST until system transfer to NUC PR.

Maintenance inspections are performed by CONST on a monthly basis, and the last inspection of this equipment on October 17, 1983, indicated that the heater breakers were energized and operating normally. Investigations by both NUC PR and CONST have failed to identify the reason the heater breakers were deenergized.

##### 3. Corrective Steps Taken and Results Achieved

At the time the violation was noted, the circuit breakers were closed and heat was returned to the ERCW pump motors.

##### 4. Corrective Steps Taken to Avoid Further Violations

A memorandum from CONST to NUC PR has been generated to place additional emphasis on this concern. The letter requested that personnel responsible for operating this equipment be aware of the requirement for the heaters to remain energized. By copy of this memorandum, the appropriate CONST personnel were also notified of this concern.

5. Date When Full Compliance Was Achieved

TVA is now in full compliance.

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2  
RESPONSE TO DEVIATION 50-438/83-28-01, 50-439/83-28-01  
FAILURE TO SUBMIT A FSAR REVISION  
IN A TIMELY MANNER PER CDR FINAL REPORT

Description of Deficiency

In a final report for a CDR (BLRD 50-438/82-17 and BLRD 50-439/82-16) dated August 9, 1982, the licensee stated that by December 1, 1982 they would revise the FSAR to reflect an exception to Regulatory Guide 1.75.

Contrary to the above, to date the licensee has not submitted the FSAR revision.

TVA Response

Admission or Denial of the Alleged Deviation

TVA admits the deviation occurred as stated.

Corrective Action That Have Been or Will Be Taken

TVA's Nuclear Licensing Staff (NLS) has maintained a system for tracking all commitments made to the NRC since November 1981. Unfortunately, the FSAR revision commitment described above failed to be entered into the system. Due to the hundreds of items that have been stored and maintained in the tracking system without an occurrence, TVA believes this to be an isolated incident. This item has now been incorporated into the system and will be tracked and its status checked periodically. The FSAR will be revised to reflect the exception to Regulatory Guide 1.75.

Corrective Actions Taken to Avoid Further Deviations

In order to avoid further deviations, staff engineers will be periodically briefed by management on the importance of making certain that all recognized commitments made by TVA to the NRC are entered into the NLS commitment tracking system and are updated as necessary and in a timely fashion.

Date Corrective Actions Will Be Completed

The FSAR will be revised to reflect the subject exception by June 1, 1984. The commitment list was updated to include the missing material on December 22, 1983. Staff briefings concerning the importance of the completeness and timeliness necessary in maintaining a viable commitment tracking system have been held periodically over the past several years and will continue to be held routinely.