

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

USNRC REGION II
ATLANTA, GEORGIA

October 7, 1983

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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
50-438/83-20-01, 50-439/83-20-01 - CONDENSATE POTS - DEVIATION
50-438/83-20-02 - RESPONSE TO VALVE LINEUP VIOLATION

This is in response to D. M. Verrelli's letter dated September 8, 1983, report numbers 50-438/83-20, 50-439/83-20 concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations and appeared to deviate from commitments made to the Commission and have significance. Enclosed is our response to the citations.

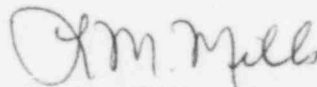
Please note that in our response to violation 50-438/83-20-01, 50-439/83-20, we stated that we are awaiting a response from the vendor detailing their corrective actions. Upon receipt of this information, TVA will apprise NRC of the results and will modify its response to the violation accordingly by December 6, 1983.

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

Records Center (Enclosure)
Institute of Nuclear Power Operations
1100 Circle 75 Parkway, Suite 1500
Atlanta, Georgia 30339

ENCLOSURE

BELLEFONTE NUCLEAR PLANT RESPONSE TO SEVERITY LEVEL V VIOLATION 50-438/83-20-01, 50-439/83-20-01 CONDENSATE POTS

Description of Deficiency

10 CFR 50, Appendix B, Criterion VII and the accepted QA Program (TVA-TR75-1A, Revision 5) Section 17.1A.7 requires that measures shall be established to assure that purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents. These measures shall include provisions, as appropriate, for source evaluation and selection, objective evidence of quality furnished by the contractor or subcontract inspection at the contractor or subcontractor source, and examination of products upon delivery.

ASTM SA 312 requires that the finished pipes shall be reasonably straight and free from injurious defects and shall have a workmanlike finish. Bellefonte's Quality Control Procedures (BNP QCP-1.1 Revision 6, Attachment A) requires that workmanship be inspected.

Contrary to the above, during the week of August 30, 1982, the resident construction inspector identified several pieces of SCH 80-3" ASME Section III, Class 2, material specification ASTM SA 312, piping which exhibited poor surface condition (e.g., embedded rust particulates and gouges). A sample of this piping was sent to Singleton Labs for evaluation. This evaluation revealed the following: SA 312 states the material shall be free of injurious defects and shall have a workmanlike finish. Embedded carbon steel particles existed along the longitudinal abrasion or die main and may be considered injurious and thus a failure of the pipe to meet finish requirements.

TVA Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reason for the Violation

This violation is a result of the material issued for installation containing embedded carbon steel particles, which without magnified visual examination cannot be detected. The most practical method of detection of an unacceptable condition in this situation is magnified visual examination of the material. However, TVA does not employ this method due to the infrequent occurrence of this type of deficiency.

The investigation into the violation revealed that the subject piping exhibited a peculiar finish when it was received at the site. The piping did, however, pass receipt inspection because it met minimum wall thickness requirements and had a rough, but workable surface finish.

Based on the information available presently, this unacceptable condition appears to be an isolated instance. No documentation exists to support any other instances of similar nature.

3. Corrective Steps Taken and Results Achieved

TVA has removed the subject piping from use in any safety-related applications.

4. Corrective Action Taken to Avoid Further Violations

TVA is in the process of notifying the vendor of the unacceptable material based upon the TVA Singleton Laboratory report that identifies the unacceptable condition. TVA will request a response from the vendor detailing their reasons as to why carbon steel particles were present on the surface of the pipe and their actions to prevent recurrence of such incidents. Action on this item will be taken based on that response. TVA will also caution its personnel against the receipt of piping with a similar finish until an investigation can be performed to determine its adequacy.

5. Date When Full Compliance Will be Achieved

Corrective action for this violation will be complete upon receipt of the vendor's response to TVA's inquiry. Our final report shall be submitted on December 6, 1983.

BELLEFONTE NUCLEAR PLANT UNIT 1

RESPONSE TO DEVIATION 50-438/83-20-02

RESPONSE TO VALVE LINEUP VIOLATION

Description of Deficiency

In a letter dated May 18, 1983, in response to Item C of Appendix A to NRC Inspection Report 50-438/83-08 and 50-439/83-09, letter dated April 14, 1983, TVA stated in part that test directors are to be reinstructed in the necessity of indicating the emergency or nonroutine situations by proper documentation in the flush procedure and that this instruction would be completed by July 15, 1983.

Contrary to the above, on July 26, 1983, two test directors had not been reinstructed as stated in the May 18, 1983 letter.

TVA Response

Admission or Denial of Deviation

TVA denies the alleged deviation.

Reasons for Denial

TVA Construction continued the investigation for evidence of the reinstruction of the two test directors that was initiated during the review of violation 50-438/83-08-02 by the resident inspector. During the post exit investigation, a training record was located which indicated the two test directors had received training as required. The training occurred on May 9, 1983, with violation 50-438/83-08-02 listed as the reference document for the training and procedure changes as the subject matter.