

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

October 18, 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 UNIT 1 - RESPONSE TO VIOLATIONS
50-438/83-22-01 - FAILURE TO FOLLOW PROCEDURE FOR WELD INSPECTION -
50-438/83-22-02 - FAILURE TO FOLLOW PROCEDURE FOR HANGER INSPECTION

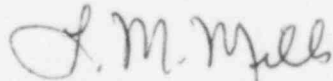
This is in response to D. M. Verrelli's letter dated September 21, 1983, report numbers 50-438/83-22, 50-439/83-22 concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations. Enclosed is our response to the citations.

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

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

BELLEFONTE NUCLEAR PLANT UNIT 1 RESPONSE TO SEVERITY LEVEL V VIOLATION 50-438/83-22-01 FAILURE TO FOLLOW PROCEDURE FOR WELD INSPECTION

Description of Deficiency

10 CFR 50, Appendix B, Criterion V as implemented by TVA-Bellefonte FSAR Section 17, paragraph 17.1.B.5, requires in part that activities affecting quality be accomplished in accordance with instruction, procedures or drawings. Bellefonte QCP-7.5, paragraph 7.0 requires that no undersize welds are permitted for fillet welds connections. Bellefonte specification 3.M.5.1(e), paragraphs B.1 and B.5, requires that undercut for base material shall not exceed 1/32" and shall not encroach on the required section thickness.

Contrary to the above, activities affecting quality were not being accomplished in accordance with documented instructions, procedures or drawings in that:

1. Hanger 1KC-MPHG-0003, sheet 1, Revision 6 contains undersize welds (fillet weld) for approximately 10 percent of the perimeter at weld joint "b" and 25 percent at weld joint "c".
2. Hanger 1KE-MPHG-0745, sheet 2, Revision 7 contains excessive undercut at two corners of weld joint "b".

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation

The failure to follow procedure for weld inspections by the welding quality control (WQC) inspectors can be attributed to inattention to detail during performance of the inspections.

3. Corrective Steps Taken and Results Achieved

Quality Control Inspection Report (QCIR) 35,796 was generated to identify the undersize fillet welds on hanger 1KC-MPHG-0003, sheet 1, Revision 6. The QCIR was dispositioned to issue repair cards. The repair cards were issued and the QCIR was closed. QCIR 35,795 was generated to identify the base material damage created by excessive grinding on the weld of 1KE-MPHG-0745, sheet 2, Revision 7. The QCIR was dispositioned to issue a repair card. The card was issued and the QCIR was closed. Repair of the welds will be accomplished in accordance with the Automated Process Control System (APC) and tracked by the weld monitoring program.

4. Corrective Steps Taken to Avoid Further Violations

An investigation was conducted by the WQC Unit regarding performance of the three inspectors who inspected the unacceptable welds. The investigation consisted of reviewing data previously generated on visual weld examinations performed by the inspectors in the time frame of the unacceptable inspections and reinspecting a sample of accepted inspections. Results of the investigation revealed that the unacceptable inspections were of an isolated nature; therefore, no additional corrective steps are necessary.

5. Date When Full Compliance Will Be Achieved

Repair of the deficient welds will be accomplished by December 1, 1983.

BELLEFONTE NUCLEAR PLANT UNIT 1
RESPONSE TO SEVERITY LEVEL V VIOLATION
50-438/83-22-02
FAILURE TO FOLLOW PROCEDURE FOR HANGER INSPECTION

Description of Deficiency

10 CFR 50, Appendix B, Criterion V as implemented by TVA-Bellefonte FSAR Section 17, paragraph 17.1.B.5, requires in part that activities affecting quality be accomplished in accordance with instructions, procedures or drawings. Bellefonte QCP-6.17, paragraph 6.6.5.2, requires that pipe clamps are properly installed and tightened around the pipe. Bellefonte construction specification G-43, paragraph 2.2, requires that pipe clamps shall not be installed directly over circumferential welds when such installation can be avoided.

Contrary to the above, activities affecting quality were not being accomplished in accordance with documented instructions, procedures or drawings in that:

1. Hanger 1ND-MPHG-0591, sheet 2, Revision 3 contained two nuts on the pipe clamp bolt that were loose, which caused the connection between the pipe clamps and the sway strut to become ineffective. As a result, the installed sway strut is not able to perform its intended function.
2. The above hanger had the pipe clamps installed directly over the circumferential weld joint.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation

The cited support was inspected and accepted on March 2, 1982. After this date, the clamp portion of the hanger was loosened by unauthorized personnel. The clamp was shifted out of position and in this condition covered the weld to exhibit the condition referenced in the violation. Evidence exists to support the fact that the clamp was in its correct position and met all procedural requirements at the time of inspection. The stud and nut of the cited hanger were match marked with paint at the time of inspection. Inspection performed which resulted in the violation indicated that the nut and stud did not match at that time. In addition, all QC documentation for the hanger was reviewed and no deviations were found.

3. Corrective Steps Taken and Results Achieved

QCIR 35803 was generated to document this condition. This support will be corrected and documentation affected will be revised by completion of this QCIR.

4. Corrective Steps Taken to Avoid Further Violations

Hanger Quality Control has issued a memorandum to all inspectors to alert them to this adverse condition. This memorandum places additional importance on providing surveillance during daily activities to correct these type of deficiencies. All components found in unacceptable conditions will be identified by separate QCIRs and corrected.

5. Date When Full Compliance Will be Achieved

Corrective action will be complete by December 1, 1983.