

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

83 DEC 5 10:43 December 2, 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 UNIT 1 - REVISED RESPONSE TO VIOLATION
50-438/83-02-04, INADEQUATE CONSTRUCTION OPERATING INSTRUCTIONS

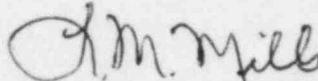
This letter is in response to the TVA/NRC telephone conference of August 5, 1983 concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations as discussed in D. M. Verrelli's letter to H. G. Parris dated February 25, 1983. Please note that our enclosed revised response supersedes our April 18, 1983 response to the citation.

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

BELLFONTE NUCLEAR PLANT UNIT 1

RESPONSE TO SEVERITY LEVEL V VIOLATION - 50-438/83-02-04 -
INADEQUATE CONSTRUCTION OPERATING INSTRUCTIONS

10 CFR 50, Appendix B, Criterion V and the accepted QA Program (TVA-TR75-14, Revision 5) Section 17.1A.5 require that activities affecting quality be accomplished in accordance with procedures and that these procedures include appropriate quantitative acceptance criteria.

TVA's Quality Assurance Program Policy (QAPP5) Rev. 2, Paragraph 3 states the following: "Instructions, procedures, or drawings shall include appropriate quantitative acceptance criteria."

Also, the licensee's accepted QA Program commits to Regulatory Guide 1.116-1976 which endorses ANSI N45.2.8-1975. Section 2.9 of this standard requires that procedural engineering limitations for installation, inspection and test procedures include the engineering limitations and requirements from manufacturers' instruction manuals.

Contrary to the above, procedures do not include appropriate acceptance criteria and requirements in that four construction operating instructions (1KE-01, 1NV-01, 1NV-02 and 1NV-03) do not include all of the quantitative requirements, i.e., precautions and limits, which are specified in vendor's technical documents Weir Pumps Limited Publication No. PSP 126 and Babcock and Wilcox (B&W) Technical Document No. 67-1003781-001. (Unit 1)

TVA Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reason for the Violation

The construction operating instructions (COIs) involving the makeup and purification (NV) system were inadequate in that precautions involving the bypass orifice isolation valves were not included in COIs 1NV-01, 1NV-02 and 1NV-03. The precautions were omitted at the time the referenced COIs were prepared based upon a verbal agreement obtained from the site B&W representative to allow operation of the pumps with the bypass isolation valves closed. Subsequent to pump operations under this verbal agreement, additional concern for system overpressurization and pump "deadheading" was raised. TVA requested written approval from B&W to operate the pumps with the bypass isolated and B&W refused. No further operation of the NV pumps was conducted under the COIs without proper orifice isolation valve alignment.

The COI involving the essential raw cooling water (KE) system was inadequate in that all of the Weir pump running checks were not included in COI 1KE-01. The running checks were omitted based on TVA's decision that the checks were highly conservative vendor recommendations which may not have been absolute requirements in every application of similar Weir pumps and that the vendor recommendations which were considered essential had been satisfied through TVA's Division of Engineering Design (EN DES) normal operating practices and the Operating Releases Procedure BNP-CTP-9.1.

3. Corrective Steps Taken and Results Achieved

COIs 1NV-01, 1NV-02 and 1NV-03 are currently being revised to provide the additional precautions which were previously omitted.

COI 1KE-01, Revision 9 issued September 8, 1983, now contains the pump running checks which were cited in the violations as being omitted from the COI.

4. Corrective Steps Taken to Avoid Further Violations

A total of twelve (12) COIs have been issued for use at Bellefonte. The remainder of the COIs not identified in the violation govern the use of air handling and chiller units. All active COIs are being reviewed by TVA's Division of Construction (CONST) to assure the appropriate vendor recommended precautions and limits are included. A memorandum has been issued from the assistant Construction Engineer responsible for COI preparation emphasizing the necessity to review vendor documentation and including applicable recommendations in COIs, in addition to requiring the review of correct COIs specified above.

5. Date When Full Compliance Will Be Achieved

All corrective action will be completed by January 20, 1984.