TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

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December 20, 1983

BLRD-50-438/83-06
BLRD-50-439/83-03

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 - DEFICIENT HANDLING OF DESIGN CHANGE REPORTS - BLRD-50-438/83-06, BLRD-50-439/83-03 - FINAL REPORT

The subject deficiency was initially reported to NRC-OIE Inspector D. M. Verrelli on December 21, 1982 in accordance with 10 CFR 50.55(e) as NCR BLN BLP 8234. This was followed by our interim reports dated January 18 and July 1, 1983. Enclosed is our final report.

If you have any questions, please get in touch with R. H. Shell at FTS 858-2688.

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

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ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2
DEFICIENT HANDLING OF DESIGN CHANGE REPORTS
BLRD-50-438/83-06, BLRD-50-439/83-03
NCR BLN BLP 8234
10 CFR 50.55(e)
FINAL REPORT

Description of Deficiency

Design change reports are the method whereby changes to mechanical piping systems are identified to personnel responsible for the piping analysis in order that the analysis can be revised to reflect these changes. The handling of design change reports has been determined to be deficient. During the INPO self-initiated evaluation, it was determined that two design change reports (Nos. 1061 and 1062) did not have associated design change impact reports nor was a file copy of either available. Insufficient information was supplied in the design change report log to enable tracing of these reports. In addition, it was determined that there are different understandings within the TVA's Division of Engineering Design, Bellefonte Design Project (BLP), Mechanical Design Project concerning the criteria for issuing a design change report.

Design change reports were established within BLP to identify changes to piping systems which require evaluation to determine if design reanalysis is necessary. Therefore, this deficiency is applicable only to the Bellefonte Nuclear Plant.

Safety Implications

The failure to insure that design change reports are written whenever necessary, or that they are properly disposed of once written, could result in changes to safety-related piping not being incorporated into the piping analyses.

Corrective Action

BLP EP-44.76 R3 has been revised to clarify (a) the responsibility and methods for documenting design change reports, and (b) the criteria for issuing a design change report. These changes provide the necessary procedural controls to prevent recurrence of this deficiency.

All design change reports written before July 12, 1983, have been identified and their status evaluated and documented to ensure adequate traceability and proper disposition. This review involved approximately 3000 design change reports. Reports produced since July 12, 1983, have been processed in accordance with the more stringent procedural controls.