

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

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March 14, 1984

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 VIOLATION 50-438/84-01-02 -  
FAILURE TO PREVENT PRACTICES THAT CAUSE DETERIORATION OF AN ELECTRICAL  
PANEL COMPONENT

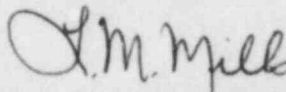
This is in response to R. C. Lewis' letter dated February 17, 1984,  
report numbers 50-438/84-01, 50-439/84-01 concerning activities at the  
Bellefonte Nuclear Plant which appeared to have been in violation of NRC  
regulations. Enclosed is our response to the citations.

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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## ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNIT 1  
RESPONSE TO SEVERITY LEVEL IV VIOLATION  
50-438/84-01-02  
FAILURE TO PREVENT PRACTICES THAT CAUSE DETERIORATION OF AN  
ELECTRICAL PANEL COMPONENT

### Description of Deficiency

10 CFR 50, Appendix B, Criterion XIII and the accepted QA Program (TVA-TR75-1A, Rev 5) Section 17.1A.13 require in part that measures shall be established to control the handling and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration.

Contrary to the above, measures have not been established to control the preservation of motor starter controllers to prevent damage or deterioration in that a water base electrical cable lubricant diluted by water was allowed to impinge directly onto the motor starter controllers in safety-related panel No. 1VA-ECMS-305-F during a cable pulling operation resulting in a degraded condition for the controller contacts and terminals.

### TVA Response

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

TVA admits the violation occurred as stated.

#### 2. Reason for the Violation

TVA's General Construction Specification G-38, "Installing Insulated Cables Rated Up To 15,000 Volts," did not address the prevention of damage to electrical panels and terminations during cable pulling operations requiring the use of lubricants. As a result, the site Quality Control Procedure BNP-QCP 3.4, "Electrical Cable and Jumpers Installation (Pulling) and Preparation (Terminating)," also did not address this concern.

An investigation of the affected panel following identification of this violation revealed that a conduit located at the bottom of the panel was rusted in addition to the motor starter being damaged. It was determined that the degraded condition of this panel was attributable in part to the similar introduction of lubricant into the panel during previous cable pulling operations.

3. Corrective Steps Taken and Results Achieved

Nonconformance report 2721 has been generated to document rework of the rusted section of conduit. The referenced motor starter will be replaced by a new one.

4. Corrective Steps Taken to Avoid Further Violations

General Construction Specification G-38, has been revised to include in Section 3.2 requirements to avoid leakage of lubricant during a cable pull in order to prevent damage to electrical terminals or contacts. Also, in case of leakage, requirements that electrical terminals or contacts be cleaned have also been included in this section. Furthermore, BNP-QCP 3.4 will be revised to require Quality Control inspectors to confirm that the panels are protected during cable pulling and are clean when complete.

TVA will additionally review all safety-related panels for possible deterioration and will add all safety-related panels containing electrical components to the site maintenance program.

5. Date When Full Compliance Will Be Achieved

TVA will be in full compliance by September 1, 1984.