

PDR

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

May 22, 1984

U.S. Nuclear Regulatory Commission
Region II
ATTN: James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Enclosed is our response to the unresolved items in D. M. Verrelli's April 20, 1984 letter to H. G. Parris, transmitting Inspection Report Nos. 50-518/84-01, 50-520/84-01, regarding activities at our Hartsville Nuclear Plant. The information contained in the enclosure is the result of a discussion between A. Schwencer and Lloyd Cantrell of NRC and the TVA staff on April 6, 1984. If you have any questions, please call Jim Domer at FTS 858-2725.

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

L. M. Mills, Manager
Nuclear Licensing

Enclosure

cc: Office of Nuclear Reactor Regulation (Enclosure)
Attention: Mr. Albert Schwencer, Chief
Licensing Branch No. 2 ✓
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Notified By *ash*

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ENCLOSURE
HARTSVILLE NUCLEAR PLANT
MAINTENANCE AND INSPECTION OF STRUCTURES AND EQUIPMENT
DURING SUSPENSION OF CONSTRUCTION
UNRESOLVED ITEMS 518/84-01-01 AND 520/84-01-01

In L. M. Mills' letter to H. R. Denton dated May 5, 1983, TVA committed to a limited maintenance effort for permanent plant structures. Critical items associated with permanent plant structures were to be maintained such that restart of construction of these structures at the end of the deferral period could begin without a major rehabilitation effort. In order to accomplish this, TVA prepared a preventive maintenance document which established guidance for the protection, preservation, and periodic inspection of specified materials. This program was developed and implemented based on the original TVA Board decision on the schedule for design restart. However, the decision for design restart has been revised by the Board and slipped to a later date.

Based on this revision to the design restart date as well as observance of minimal deterioration of structural elements at Hartsville B site, TVA has decided to alter its maintenance program of the Hartsville A site. The purpose of this letter is to inform NRC of TVA's intention to do so.

The reduced effort of preventive maintenance is based largely on what has been observed at the Hartsville B site over the past three years. The formal request for cancellation of the Hartsville B site construction permit was made in the L. M. Mills' letter to H. R. Denton dated March 22, 1983. Since that time, preventive maintenance and inspection have been discontinued for that site.

After three years of discontinued maintenance, there has been little deterioration of structural elements at Hartsville B. TVA, therefore, is changing the preventive maintenance requirements for Hartsville A as follows.

- (a) TVA will maintain all material and equipment in accordance with requirement documents with the exception of discontinuing all preventive maintenance on all structural material in storage.
- (b) TVA will discontinue all preventive maintenance on permanent structures including installed material (excluding engineered equipment) and embedments for a period of three years. A thorough onsite inspection will be made annually to assess the conditions of the installed material and permanent structures and corrective steps taken as necessary.

- (c) For all stored and/or installed material, preventive maintenance will be applied to any item that is determined to present a safety hazard to personnel. However, site personnel safety requirements may be achieved in some cases by preventing access to the area or by removing the item.
- (d) Structural materials in class D storage areas are not being maintained since most are being disposed of as excess material.

The preventive maintenance program is continuing to be controlled by issued preventive maintenance documents, A TVA Division of Engineering Design engineering inspection team will monitor and evaluate the effectiveness of the preventive maintenance program by visiting the site for detailed inspections of program results. This required annual inspection will result in immediate corrective action for any required preventive maintenance before damage to structural integrity occurs. This more limited maintenance effort underway for permanent plant structures during the period of deferral will maintain critical items for permanent plant structures in such a way that restart of construction on these structures at the end of the deferral period may begin without a major rehabilitation effort.

The basic principles, design philosophy, nor details of deferral plans previously presented to the NRC have been changed by this reassessment. TVA has every confidence that this revised program will adequately maintain the Hartsville A site for restart of design and construction. All QA requirements are being fully met by this approach.