

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

34 AUG 27 ~~August 24~~, 1984

BLRD-50-438/83-64

BLRD-50-439/83-58

U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Dear Mr. O'Reilly:

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2 - TRANSAMERICA DELAVAL QA PROGRAM
DEFICIENCIES - BLRD-50-438/83-64, BLRD-50-439/83-58 - FINAL REPORT

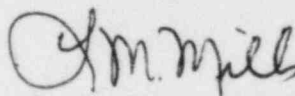
The subject deficiency was initially reported to NRC-OIE Inspector Linda Watson on December 6, 1983 in accordance with 10 CFR 50.55(e) as NCR QDBVA-84-18 Deficiencies 1, 3, and 6. This was followed by our interim report dated January 5, 1984. Enclosed is our final report. We consider 10 CFR Part 21 applicable to this deficiency.

TVA does not now consider the subject nonconforming condition adverse to the safe operation of the plant. Therefore, we will amend our records to delete this subject nonconformance as a 10 CFR 50.55(e) item.

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
TRANSAMERICA DELAVAL QA PROGRAM DEFICIENCIES
BLRD-50-438/83-64, BLRD-50-439/83-58
NCR QDBVA-84-18 DEFICIENCIES 1, 3, AND 6
10 CFR 50.55(e)
FINAL REPORT

Description of Deficiency

During a TVA vendor audit (QDBVA-84-18) of Transamerica Delaval, Incorporated (TDI), Oakland, California, several deficiencies were noted which indicate noncompliance with their own quality assurance program. TDI supplies emergency diesel generators to TVA and their quality assurance program had previously been accepted by TVA. A description of the deficiencies that were found during the audit follows.

Design Control

Deficiency 1

In the area of design control there exists a lack of a configuration control program which defines the actual configuration of each control panel for the TDI generators. No design baseline exists for the panels.

Control cabinet 77024 (job No. 80045) was inspected/tested between July 27 and August 30, 1981, with final acceptance testing being accomplished on September 2, 1981. Drawing set 09-500-77024, sheets 1-11, revision J, was used during these inspections and tests. Further, revisions K and L were mandatory changes which were required to be made to all the panels, and revision M should have been incorporated to ensure that all panels were the same. No objective evidence was available in engineering, inventory control, or the panel shop to identify the actual configuration of panels manufactured with this order. Inventory control records indicate the parts list used with this order was last revised on September 3, 1981, (revision 22) and that subsequent revisions (23, 24, and 25) were not incorporated on this order. Further, both engineering and inventory records on the transmittal of the changes have been destroyed in accordance with Delaval procedures. Two different types of change notices are used (drawing change notices for drawings and engineering memorandums for the parts list) neither of which cross references the other. Changes which are not incorporated before shipment are to be incorporated by the engineering service department. The engineering service department does not receive engineering changes but is sent memorandums from design engineering. These memorandums also do not reference the change documents. There was no documentation in the service department to indicate that all the changes to be incorporated by revisions K and L were accomplished. The only evidence available on final configuration is the test records which indicate that revisions K, L, and M were not incorporated.

Deficiency 6

There was a failure to ensure that seismic requirements of the contracts had been fully implemented. No objective evidence was available for review to show that changes to the seismically qualified control panel had been reviewed for impact on the qualification test results. The control panels themselves are not considered to be safety related by TDI. Therefore, appropriate quality assurance requirements relating to the panels' manufacture (i.e., structural) had not been imposed on the subcontractor who manufactured the panels.

Test Control

Deficiency 3

Neither test procedure 1A-6803 for testing of the reflash board assembly, nor final acceptance test procedure 77024-500 requires recording of any test data, listing of instruments used, or any evaluation of test results. Further, the completed procedure for the test of unit 77034 indicated that test items 2 and 4B had not been signed off as being completed.

No objective evidence was available for review that personnel performing panel tests are qualified.

Safety Implications

TVA has determined that the subject deficiencies do not apply to the panels manufactured for Bellefonte Nuclear Plant. The drawing for the BLN panels (09-500-75080) is currently at revision level L. Revisions K and L to the BLN drawing were made as a result of vendor-approved TVA field modifications. The modifications involved wiring changes and would have had no effect on the seismic qualification of the panels.

Test personnel training records were reviewed during the April 23, 1984, reaudit and were satisfactory. The panels in question have already been delivered to TVA; and while the test data was not recorded and independently analyzed, the data was evaluated in real time by qualified personnel who then signed the test paragraph of the procedure to document a successful test. In addition, the majority of the test points performed were simple pass/fail in nature, and all test procedures had been reviewed and approved before use. The final panel tests were also a TVA inspection witness point. On this basis, the testing accomplished by TDI is acceptable for the control panels. Thus, 10 CFR 50.55(e) does not apply to this deficiency for Bellefonte Nuclear Plant.