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Power Generation Department



August 14, 1979

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

REFERENCE:
RII: RFR
50-321/79-17
50-366/79-21

ATTENTION: Mr. R. C. Lewis

GENTLEMEN:

The Georgia Power Company wishes to submit the following information in response to your letter of July 20, 1979, describing three apparent noncompliances with NRC requirements noted during your May 12 - June 1, 1979, inspection of Plant Hatch.

- A. Items reportable within 24 hours per Technical Specification 6.9.1.B.
1. Delinquency of reporting seismic design deficiency in the cable spreading room fire sprinkler hangers.
 - a. The event described in A.1 is a result of a breakdown of communication between the architect-engineer and the licensee. The architect-engineer was apprised of the necessity for prompt reporting of design deficiencies.
 - b. To prevent further noncompliance, procedures will be developed in each design group to alert both site personnel and the appropriate general office personnel when design deficiencies are discovered so that the proper reporting will be made in a timely manner.
 - c. The procedures will be revised by September 15, 1979.

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2. Delinquency of 24-hour report on inadequate seismic qualification of six safety-related pressure and level instruments.
 - a. The personnel involved in reporting this deviation had thought that the Plant Review Board determined if a Deviation Report was reportable. As an initial action the personnel involved with this particular deviation were instructed not to wait for a PRB decision when an occurrence is reportable.
 - b. To prevent further noncompliances procedure HNP-425 will be revised to clarify that the shift foreman on duty will make the initial decision on reportability and that the Superintendent of Plant Engineering Services and the Superintendent of Operations will determine if it should be reported within 24 hours.
 - c. The procedure will be revised by September 15, 1979.
- B. Failure to establish and implement written procedures as required by Technical Specification 6.8.1.
 1. A standing order was issued for HNP-II on June 21, 1979, requiring a licensed plant operator or assistant plant operator to verify ECCS valve positions within two (2) hours after each shift change. The shift foreman is required to review the ECCS status data sheets. This valve position check is performed three (3) times each day. The standing order will be expanded to also apply to HNP-I prior to HNP-I startup.
 2. Further corrective action will be to generate a plant procedure to include these ECCS valve position data sheets and to revise HNP-I(II)-1050 procedure to include ECCS valve position status surveillance to be performed each shift.
 3. Full compliance will be achieved by January 1, 1980.

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C. Failure to retain records as required by Technical Specification 6.10.1.d.

This deficiency was written because documentation was unable to produce the last performance of procedure HNP-2-3209, Core Spray Auto Actuation. This procedure has a performance frequency of once/operating cycle. The pre-operational test procedure was performed on the core spray system prior to startup. There is no requirement to perform procedure HNP-2-3209 prior to startup. Therefore, this procedure has not been performed and no completed copy of the data sheet would be in documentation.

Very truly yours,

W. A. Widner (8414)

W. A. Widner
Manager - Nuclear Operations

JAB/mt

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