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August 30, 1982

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Georgia Power
the southern electric system

J. T. Beckham, Jr.
Vice President and General Manager
Nuclear Generation

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 3100
101 Marietta Street, NW
Atlanta, Georgia 30303

REFERENCE:
RII: JPO
50-321/50-366
Inspection Report
82-20

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

The following information is submitted in response to I&E Inspection Report 50-321/82-20 and 50-366/82-20:

VIOLATION A:

Technical Specification 6.8.1 requires that procedures controlling the operation of safety-related systems be implemented. Plant procedure HNP-1-1200, Plant Service Water, Data Package 1, requires that PSW pump cooling water isolation valves be locked open and that other status be double verified.

Contrary to the above, on June 18, 1982, the Unit 1 cooling water isolation valve for 1D Plant Service Water (PSW) pump was found by the inspector not locked open and properly verified in that position as required by the HNP-1-1200 procedure. The valve was later determined to be partially open.

This is a Severity Level IV Violation.

RESPONSE:

Admission or denial of violation:

The violation did occur, except that the valve which was not locked open was the 1D PSW pump seal water isolation valve not the 1D PSW pump cooling water isolation valve as cited.

Reason for Violation:

On June 3, 1982, operations personnel returned the 1D Plant Service Water (PSW) pump to service following pump maintenance. Administrative Procedure HNP-501, R10, "EQUIPMENT CLEARANCE AND TAGGING," was used to control this operation, but was deficient in that it did not specify that the 1D PWS pump seal water isolation valve was required to be locked open.

This procedure deficiency had been previously identified and HNP-501, R10 was in the process of being revised.

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Corrective steps which have been taken and the results achieved:

On June 18, 1982, the subject valve was immediately locked open as required by HNP-1-1200. A complete valve line-up for PSW at the Intake Building for both Units 1 and 2 was completed (per HNP-1-1200 and HNP-2-1200, respectively) on June 19, 1982.

Corrective Steps that will be taken to avoid further violations:

A procedure revision request for HNP-501, which called for a new Clearance Sheet, was approved by the Plant Review Board (PRB) on May 18, 1982. HNP-501, R11 contains the new Clearance Sheet which requires that the Shift Foreman indicate any valves required to be locked open or closed. The revised procedure was fully implemented in plant operations on June 20, 1982.

Operating personnel have been informed of the significance of locking the appropriate valves in their proper position.

The date when full compliance will be achieved:

Full compliance with HNP-1-1200 was achieved on June 18, 1982.

VIOLATION B:

Technical Specification 3.9.12.a requires that operations involving an increase in either reactor decay heat load or a positive reactivity change be suspended when the Residual Heat Removal (RHR) system is inoperable.

Contrary to the above, on April 19, 1982, the licensee failed to declare the Unit 2 "A" loop RHR system inoperable and halt refueling operations when maintenance personnel de-energized the vertical portion of the 601 panel (RHR section) in the control room. The vertical portion of the RHR section of the 601 panel had been de-energized for approximately 20 hours.

This is a Severity Level IV Violation.

RESPONSE:

Admission or denial of violation:

The violation did occur.

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Reason for Violation:

At 1345 CDT on April 19, 1982, maintenance personnel opened a sliding link while conducting wiring changes in the control room per Design Change Request 79-440 and de-energized the "A" loop RHR and RHR Service Water flow indicators as well as the RHR Heat Exchanger Service Water pressure control valve controller which were located on the vertical portion of the 601 panel in the control room. This work was not being done in accordance with the "LIFTED WIRE AND TEMPORARY JUMPER CONTROL" procedure, HNP-504, thus the Shift Foreman was not aware of the work being done at that time. The violation was exacerbated by the fact that the operators failed to notice or take corrective action on the de-energized instruments for approximately 17 hours (0630 CDT, April 20, 1982) until it was brought to their attention by the NRC inspector.

Corrective steps which have been taken and the results achieved:

On April 20, 1982, RHR & RHR Service Water Systems on the "A" loop were declared inoperable, and fuel movement was suspended. The instruments were re-energized and alternate sliding links were used for DCR 79-440. The "A" loop of RHR and RHR Service Water was declared operable on April 20, 1982, at 1230 CDT.

Corrective steps that will be taken to avoid further violations:

Operators have been instructed to be more attentive of instrumentation in the control room which informs them of plant conditions. Maintenance personnel were also instructed that, "In implementing a DCR, all appropriate plant procedures actually control the work." They were reminded that a hot circuit could not be broken without complying with the appropriate plant procedures.

A Training Directive will be issued per HNP-209, "DEPARTMENTAL DIRECTIVES" prior to October 1, 1982. This directive will require that all Maintenance Personnel be trained on the requirements of HNP-504, "LIFTED WIRE AND TEMPORARY JUMPER CONTROL."

The date when full compliance will be achieved:

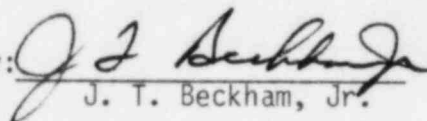
Full compliance was achieved on April 20, 1982.

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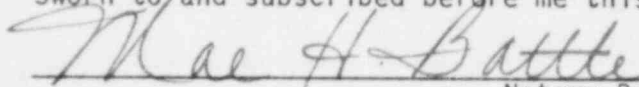
If you have any questions regarding our response to Inspection Report 82-20, please contact my office.

J. T. Beckham, Jr. states that he is Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that to the best of his knowledge and belief the facts set forth in this letter are true.

GEORGIA POWER COMPANY

By: 
J. T. Beckham, Jr.

Sworn to and subscribed before me this 30th day of August, 1982


Mae H. Battle
Notary Public

Notary Public, Georgia, State at Large
My Commission Expires Sept. 20, 1983

DLT/mb

Enclosure

xc: H. C. Nix
R. F. Rogers, III
J. P. O'Reilly (NRC-Region II)