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October 4, 1982



Georgia Power

the southern electric system

J. T. Beckham, Jr.  
Vice President and General Manager  
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U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region II - Suite 3100  
101 Marietta Street, NW  
Atlanta, Georgia 30303

REFERENCE:  
RII: RCL  
Inspection Reports  
50-321/82-25,  
50-366/82-24

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

The following information is submitted in response to Inspection Reports 50-321/82-25 and 50-366/82-24 concerning the inspection conducted by Mr. R. F. Rogers, III of your office on June 22-July 26, 1982. Two apparent violations were reported:

VIOLATION A

Technical Specification 6.8.1 requires that procedures controlling the operation of safety-related systems be implemented. Plant procedure HNP-P-2001 (sic), Annunciator Response Procedures, requires that on a scram with MSIVs closed, the safety relief valves (SRVs) be manually opened to maintain reactor pressure between 800 and 1040 psig. Plant procedures HNP-1-1907, Failure of Safety/Relief Valves to Operate, Step B.1.a., requires that if one safety/relief valve has failed to operate, that valves should be opened as necessary to prevent reactor vessel overpressurization.

Contrary to the above, subsequent to a scram with MSIV closure on July 3, 1982, safety relief valves were not manually operated as required when all eleven failed to open at their proper setpoints of between 1080 and 1100 psig. Partial automatic SRV actuation did occur at approximately 1200 psig, terminating the overpressure condition.

This is a Severity Level IV Violation (Supplement I). This applies to Unit 1 only.

RESPONSE TO VIOLATION A

Admission or denial of alleged violation: The violation occurred.

Reason for the violation: The violation resulted from operators failing to utilize the diverse instrumentation available to them in the control room. The instrument which was monitored was defective and provided erroneous readings in the range of interest. Consequently, the operators failed to respond as required in plant procedures.

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RESPONSE TO VIOLATION A (Continued):

Corrective steps which have been taken and results achieved: Procedures HNP-1-1907 and HNP-2-1907 (Failure of Safety Relief Valves to Operate) have been revised to better direct operators when to manually operate SRVs which fail to operate as required on pressure.

Training now emphasizes to operators the importance of utilizing diverse instrumentation for monitoring and controlling important parameters such as water level, pressure, and temperature during transients. Also being emphasized to operators is the importance of procedure compliance on pressure transients to maintain pressure as required. This information is in HNP-1-1907 and HNP-2-1907 (Failure of Safety Relief Valves to Operate) and HNP-1-2001 and HNP-2-2001 (Annunciator Response Procedures). These procedures have been reviewed by operations personnel as a Departmental Directive (No. 0-82-06).

Corrective steps which will be taken to avoid future violations: Plant supervision has emphasized to plant personnel the rules for performing and following procedures. As discussed above, a training program has been enacted to address these points.

Date when full compliance will be achieved: Procedures were revised and approved on July 30, 1982. By September 14, 1982, all licensed shift personnel had completed the training directive.

VIOLATION B:

Technical Specification 3.13.6.a (Unit 1) and 3.7.7.a. (Unit 2) require that non-functional fire barrier penetrations protecting safety-related areas be monitored by a continuous fire watch or equivalent on one side of the affected penetration within 1 hour.

Contrary to the above, approximately 20 fire doors on Units 1 and 2 were found to be non-functional prior to April 14, 1982 and fire watches or equivalent were not established as required.

This is a Severity Level IV Violation (Supplement I). This applies to Units 1 and 2.

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RESPONSE TO VIOLATION B:

Admission or denial of the alleged violation: The violation occurred.

Reason for the violation: Technical Specifications 3.13.6 (Unit 1) and 3.7.7 (Unit 2) address "Fire Barrier Penetration Fire Seals" and "Penetration Fire Barriers", respectively. The Technical Specifications do not specifically address fire doors within the scope of their requirements; therefore, fire watches were not established nor credit taken for equivalent monitoring (operable smoke detection) for the period from 10-30-79 to 4-14-82.

Corrective steps which have been taken and results achieved: When the discrepancy concerning placement and rating of fire doors was identified in October 1979, Maintenance Requests were issued for a QC inspection to evaluate the scope of the problem. A Request for Engineering Assistance (REA HT-0723) was issued November 13, 1980, to request the A/E's to resolve any discrepancies between the Hatch Fire Protection Program Evaluation, plant fire wall delineation drawings, and the door schedule drawings. As a result of the request of the A/E's, As-Built Notices 81-156, 81-157, and 81-158 were issued to revise the fire door schedule drawings; and Design Change Request 81-86 was issued on April 1, 1981, to make the necessary modifications to the fire doors and/or fire door frames that were identified as possibly having an inadequate rating. These steps were taken to provide corrective action for the identified discrepancies.

Also, upon receipt of the NRC's interpretation of the previously referenced Technical Specification sections on April 14, 1982, fire watches or equivalent monitoring were established for the areas affected by the "non-functional" fire barrier penetration seal. These conditions remained in effect until modifications were completed. On May 14, 1982, LER 50-321/82-34 was issued to the NRC identifying the discrepancy (date for issuance of LER 50-321/82-34 was incorrectly referenced as April 14, 1982, in I&E Inspection Report 50-321/82-25 and 50-366/82-24).

Corrective steps which will be taken to avoid future violations: A special instruction statement will be developed and will be utilized as an attachment to Maintenance Requests (MR's) and/or Design Change Requests (DCR's) that have the potential for affecting fire barriers or penetration seals. The statement will provide sufficient precautions to

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RESPONSE TO VIOLATION B (Continued):

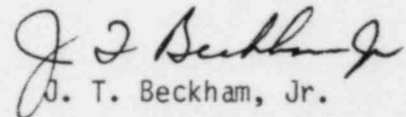
insure that modification or repair activities, whether directly or indirectly involving fire protection systems or components, are reviewed. This review will check for installation of approved components, proper placement of those components, the probabilities of breaching fire barriers or penetration seals, and the requirements for establishing fire watches. This step will be taken as interim corrective action until such time as a training directive can be established providing detailed information for application of fire protection program criteria to modification and repair activities.

Date when full compliance was or will be achieved: On April 14, 1982, upon receipt of NRC Region II's interpretation of functional versus non-functional fire barrier penetration seals, fire watches were immediately established for the discrepant fire doors/frames until they were corrected on May 14, 1982.

The special instruction statement for MR's and DCR's will be developed and in place by October 8, 1982. The training directive for application of fire protection program criteria to modification and repair activities will be developed and in place by January 8, 1983.

If you have any questions in this regard, please contact this office.

Sincerely yours,

  
J. T. Beckham, Jr.

JAE/mb

xc: H. C. Nix, Jr.  
R. F. Rogers, III