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J. T. Beckham, Jr.
Vice President - Nuclear
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Georgia Power
the southern electric system

October 8, 1993

Docket Nos. 50-321
50-366

HL-3484

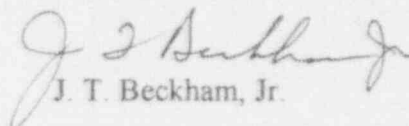
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Edwin I. Hatch Nuclear Plant
Reply to a Notice of Violation

Gentlemen:

In response to your letter dated September 10, 1993 and in accordance with the requirements of 10CFR 2.201, Georgia Power Company (GPC) is providing the enclosed response to the Notice of Violation associated with Inspection Report 93-16. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Sincerely,


J. T. Beckham, Jr.

JKB/cr
003484

Enclosure: Violation 93-16-01 and GPC Response

cc: Georgia Power Company
Mr. H. L. Sumner, General Manager - Nuclear Plant
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. K. Jabbour, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebner, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

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Edwin I. Hatch Nuclear Plant Violation 93-16-01 and GPC Response

VIOLATION 93-16-01

Technical Specification (TS) 6.11 requires that procedures for personnel radiation protection be prepared consistent with the requirements of 10 CFR Part 20 and be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

Administrative Control Procedure, 60AC-HPX-004-0S, Radiation and Contamination Control, Revision 11, dated July 7, 1992, Step 8.1.4.1 defines a Very High Radiation area as an area which could be made accessible to an individual and in which potential radiological conditions could increase very rapidly resulting in an individual receiving an acute overexposure, exceeding Administrative and/or Federal limits. Step 8.1.4.2 states that Very High Radiation Areas shall be locked and conspicuously posted with a sign unique to the type area.

Contrary to the above, the licensee failed to lock an access point to the Unit 1 Transversing (sic) Incore Probe (TIP) room, a posted Very High Radiation Area. Specifically, a permanently installed ladder was located in an opening on the roof of the TIP room which provided access from the roof area into the TIP room. Further, on August 9, 1993, during facility tours, the inspector observed a step ladder adjacent to the exterior of the TIP room which facilitated personnel access to the TIP room roof area, and, therefore, to the roof opening and the unlocked permanent ladder.

This is a Severity Level IV violation (Supplement IV).

RESPONSE TO VIOLATION 93-16-01

Admission or Denial of the Violation:

The violation occurred as described in the Notice of Violation.

Reason for the Violation:

This violation was the result of an inadequate design caused by personnel error. Responsible personnel, in developing the package for Design Change Request 1H91-078,

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Violation 93-16-01 and GPC Response

failed to follow the requirements of plant Administrative Control Procedure 60AC-HPX-004-0S, "Radiation and Contamination Control." Specifically, they failed to ensure the new design met the procedural requirement that permanent access points to very high radiation areas be controlled. Additionally, individuals using the temporary step ladder for access to the traversing incore probe (TIP) room roof did not adhere to administrative policy for equipment utilization and plant housekeeping. Specifically, they failed to remove and secure the temporary step ladder when it was not required for maintenance activities. As a result, the temporary step ladder on the exterior of the TIP room could have allowed personnel access to the TIP room roof area. Consequently, given the presence of the unlocked permanent ladder from the TIP room roof to the TIP room, the temporary ladder contributed to the failure to meet the requirements of Administrative Control Procedure 60AC-HPX-004-0S.

Prior to implementation of Design Change Request 1H91-078, a ladder from the Unit 1 TIP room roof existed, but it was located outside the locked barrier providing access to the Unit 1 TIP room. As part of Design Change Request 1H91-078, a door was moved in order to provide better control of access to the TIP room. However, as a result of moving the door, the relative position of the door and ladder changed such that the ladder was located inside the locked barrier. Therefore, the design change provided an additional access point to the TIP room, a posted very high radiation area.

Design personnel failed to incorporate the requirements of Procedure 60AC-HPX-004-0S into their design for the additional access point. As a result of this error, the approved design package did not either remove the ladder or add a locking device to it. Instead, administrative controls in the form of ribbon and postings were used, contrary to the procedure's requirements, to control access from the TIP room roof to the TIP room via the ladder.

Corrective Steps Which Have Been Taken and the Results Achieved:

The ladder providing access from the Unit 1 TIP room roof to the Unit 1 TIP room area was removed on August 9, 1993. Other very high radiation areas, as defined by plant Procedure 60AC-HPX-004-0S have been inspected. No similar access points were found in, or leading to, these areas. Since the permanent ladder has been removed, no further corrective actions are required. With the removal of the permanent ladder, the use of a temporary ladder to access the TIP room roof area does not violate the requirements of

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Procedure 60AC-HPX-004-OS, as access from the TIP room roof to the TIP room is prevented.

Personnel responsible for the error are no longer associated with the Architect/Engineer. Consequently, counseling was not considered to be effective. However, this event has been reviewed in detail with the appropriate Architect/Engineer management.

Corrective Steps Which Will be Taken to Avoid Further Violations:

No further corrective actions are required.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on August 9, 1993 when the ladder providing access from the Unit 1 TIP room roof to the Unit 1 TIP room area was removed.