

Georgia Power Company  
333 Piedmont Avenue  
Atlanta, Georgia 30308  
Telephone 404 526-6526

Mailing Address:  
Post Office Box 4545  
Atlanta, Georgia 30302



Georgia Power

the southern electric system

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December 28, 1982

Power Generation Department

U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region II - Suite 2900  
101 Marietta Street, NW  
Atlanta, Georgia 30303

REFERENCE:  
RII: JPO  
50-321/50-366  
Inspection Report  
82-35/82-33

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

The referenced inspection report identified a violation of NRC requirements. We have reviewed the violation and offer the following response.

#### VIOLATION

Technical Specification 6.8.1 requires that procedures controlling the operation of safety-related systems be implemented. Plant procedures HNP-1-3654 and HNP-2-3654, Standby Gas Treatment Train Automatic Initiation, was written to implement the requirements of Technical Specification 4.7.8.1.d. and 4.6.6.1.d.2, respectively.

Contrary to the above, HNP-1-3654 and HNP-2-3654 did not adequately implement the requirements of Technical Specification 4.7.8.1.d and 4.6.6.1.d.2. Although surveillance testing was scheduled and being conducted, a technical inadequacy existed, in that a complete test from sensor to activated device was not accomplished for Loss of Coolant Accident and the refueling floor radiation monitor signals.

#### RESPONSE

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

Reason for the violation: A complete test from sensor to activated device was not accomplished for the Unit 1 and Unit 2 Standby Gas Treatment Systems due to inadequacies in the testing procedures of the system. The testing of this system logic involves several procedures each of which covers testing of only a portion of the total logic train. Several portions of the logic system were inadvertently not included in any one of these procedures, resulting in untested gaps in the logic train run from sensor to activated device.

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Corrective steps which have been taken and the results achieved: New procedures were written for the one time testing of the portions of the Unit 1 and Unit 2 Standby Gas Treatment System logics which were previously excluded from testing under plant procedures HNP-1-3654 and HNP-2-3654. The testing covered by these new procedures was performed and completed on October 14, 1982.

Logic test procedures for all Unit 2 safety-related systems were reviewed and technical inadequacies in testing were also found to exist in other safety-related systems. New procedures were issued and performed or existing procedures were revised and performed to test logic excluded in Unit 2 logic testing procedures as identified by this review. Reportable Occurrence Report No. 50-366/1982-112, listing the systems which had inadequate testing procedures, has been submitted to the NRC.

Unit 2 safety-related systems for which surveillance testing under the new and revised procedures has been completed include the following:

<u>System</u>	<u>Unit 2 Technical Specification</u>
Reactor Core Isolation Cooling	4.3.4.1 and Table 3.3.4-1
High Pressure Coolant Injection	4.5.1.c.1
Automatic Depressurization	4.5.2.a
Residual Heat Removal	4.6.3.2


Corrective steps which will be taken to avoid future violations: Prior to startup from the current Unit 1 refueling outage, the logic test procedures for all Unit 1 safety-related systems will be reviewed for adequacy and revised as necessary. The new procedures written to test logic excluded in previous Unit 2 logic testing procedures are for one time tests and will be submitted for permanent revision by March 1, 1983. This will result in correct procedures being in place prior to the next logic system functional test required by Technical Specifications for each of these systems.

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Date when full compliance will be achieved: Full compliance was  
achieved on October 14, 1982.

Should there be any any questions regarding this issue, please contact  
this office.

Very truly yours,



L. T. Gucwa  
Chief Nuclear Engineer

CBS/mb

xc: J. T. Beckham, Jr.  
H. C. Nix, Jr.  
Senior Resident Inspector