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August 22, 1994

Docket No. 50-366

HL-4673

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

Edwin I. Hatch Nuclear Plant - Unit 2  
Reply to a Notice of Violation

Gentlemen:

In response to your letter dated August 2, 1994, and according to the requirements of 10 CFR 2.201, Georgia Power Company (GPC) is providing the enclosed response to the Notice of Violation associated with Inspection Report 94-15. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Sincerely,

J. T. Beckham, Jr.

JKB/et

Enclosure: Violation 94-15-01 and GPC Response

cc: Georgia Power Company

Mr. H. L. Sumner, Nuclear Plant General Manager  
NORMS

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

U.S. Nuclear Regulatory Commission, Washington, D. C.  
Mr. S. D. Ebner, Regional Administrator  
Mr. R. L. Holbrook, Senior Resident Inspector - Hatch

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VIOLATION 94-15-01

Criterion V of Appendix B of 10 CFR 50 requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, the request for laboratory analysis of a representative sample of the main control room charcoal filters was not prescribed by documents appropriate to the circumstances, in that the request did not stipulate a charcoal bed depth and the wrong bed depth was used for the analysis; and procedure 42SV-Z41-002-0S: Testing of Control Room Habitability Filter Trains, did not contain appropriate quantitative acceptance criteria to implement the requirements of Unit 2 Technical Specification 3/4.7.2, Main Control Room Environmental Control System.

This is a Severity Level IV violation (Supplement 1).

This violation is applicable to Unit 2 only.

RESPONSE TO VIOLATION 94-15-01

Admission or denial of the violation:

The violation occurred as described in the Notice of Violation.

Reason for the violation:

The violation was caused by less than adequate procedural controls and personnel error. Plant surveillance procedure 42SV-Z41-002-0S, "Testing of Control Room Habitability Filter Trains," was less than adequate in that it did not specify the bed depth for the testing of the Main Control Room Environmental Control System (MCRECS) charcoal filter media sample. Personnel erroneously included in the surveillance procedure an improper

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acceptance criterion for MCRECS charcoal sample efficiency and specified some tests to be performed at an incorrect bed depth. Contributing to the cause of this violation were less than adequate Unit 1 and Unit 2 Technical Specifications governing MCRECS charcoal filter media efficiency.

The MCRECS is a unit-common system designed to maintain the habitability of the Main Control Room during accident conditions. As such, both units' Technical Specifications contain operability and testing requirements for this system. One of the requirements contained in the Technical Specifications is MCRECS charcoal filter media efficiency. However, the efficiency given in each specification is different. The Unit 1 Technical Specifications require a charcoal efficiency of  $\geq 90$  percent methyl iodine removal whereas the Unit 2 Technical Specifications reference Regulatory Guide 1.52, Revision 1. This regulatory guide, which is generic to atmosphere clean-up systems at nuclear power plants, contains three different acceptance criteria depending on system location and filter bed configuration.

Plant procedure 42SV-Z41-002-0S provides instructions for the testing of the MCRECS filter trains required by Unit 1 Technical Specifications sections 3.12.A.2 and 4.12.A.2 and Unit 2 Technical Specifications sections 4.7.2.c and 4.7.2.d. The procedure, among other tests, directs plant personnel to obtain a sample of the charcoal filter bed and send it to an offsite laboratory for iodine retention analysis.

The procedure specifies the standard by which the MCRECS charcoal filter sample is to be tested, and the temperature and humidity to which the sample is to be subjected during the testing. However, the procedure specifies an incorrect acceptance criterion for the sample efficiency for the purpose of meeting the requirements for both units. That is, it lists an acceptance criterion of  $\geq 90$  percent methyl iodine removal for the charcoal sample that does not meet the requirements of the Unit 2 Technical Specifications. Personnel erroneously included the incorrect acceptance criterion in a revision to the procedure in 1990. It appears the differences in the charcoal efficiency requirements given in the Unit 1 and Unit 2 Technical Specifications and the lack of an explicit value in the Unit 2 Technical Specifications contributed to this error. Additionally, the procedure did not define the bed depth required for the test. As a result, either plant personnel incorrectly instructed laboratory personnel to perform some of the tests using a four-inch bed depth or the laboratory technician confused the MCRECS charcoal sample test with other charcoal sample tests performed for Plant Hatch using the four-inch bed depth.

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Corrective steps which have been taken and the results achieved:

As a result of this event, the following corrective actions have been taken:

1. The charcoal in the "A" and "B" MCRECS filter trains was replaced on 6/17/94 and 6/14/94, respectively. A sample from the new charcoal in both filter trains was analyzed at the correct two-inch bed depth. The results indicated charcoal media efficiencies greater than 99 percent as required by the Unit 2 Technical Specifications.
2. A change order to the purchase order under which the offsite laboratory performs charcoal sample testing was issued on 6/23/94. This change order specified bed depth requirements for tests performed on both MCRECS and Unit 1 and Unit 2 Standby Gas Treatment System charcoal filter media.
3. The Unit 1 and Unit 2 Standby Gas Treatment System filter testing procedures were reviewed. It was determined the procedures specify the Technical Specifications acceptance criteria for charcoal sample efficiency and the correct bed depth for the efficiency test.
4. A request to change the Unit 1 and Unit 2 Technical Specifications' charcoal filter media efficiency criterion for the MCRECS so that it is the same, and explicitly stated, in both units' Specifications was submitted to the NRC on 2/25/94 as part of the Technical Specification Improvement Program (TSIP).

Because the error in the surveillance procedure revision occurred four years ago and was made by personnel no longer associated with charcoal filter testing, counseling was not considered to be an effective corrective action.

Corrective steps which will be taken to avoid further violations:

Plant surveillance procedure 42SV-Z41-002-0S will be revised to change the charcoal efficiency requirement to  $\geq 99$  percent methyl iodine removal as required by the Unit 2 Technical Specifications. The procedure also will be revised to incorporate the bed depth requirement for MCRECS charcoal sample testing. The procedure revision will be effective by 8/31/94, before the next scheduled test of the MCRECS filter trains.

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Date when full compliance will be achieved:

Full compliance will be achieved by 8/31/94 when procedure 42SV-Z41-02-0S is revised to incorporate the correct charcoal efficiency acceptance criterion and test sample bed depth.