

Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-7020

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

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

83 MAR 28 All : 06



NED-83-164

March 21, 1983

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

REFERENCE:
RII: RCL
50-321
Inspection Report
83-01

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

Georgia Power Company submits the following information in response to I&E Inspection Reports 50-321/83-01 and 50-366/83-01 concerning the inspection conducted by Mr. B. R. Crowley on January 18-21, 1983 at Plant Hatch. One violation, which cited three examples, was identified and considered applicable to Unit 1.

VIOLATION

Technical Specification 6.8.1.a. requires that procedures for repair or replacement of equipment be established and implemented. Site procedure HNP-34, "Rules for Performing Procedures" requires that no steps in a procedure be skipped or swapped unless allowed by procedure and verbatim compliance with procedures. Procedure HNP-6916, "Control of Welding Materials", requires return of all unused rods and rod stubs upon completion of welding or at the end of the shift. Procedure HNP-1-10174, "Weld Overlay Repair Procedure", the applicable procedure for repair of RECIR (sic) and RHR system pipe welds, requires that (1) procedure steps be performed in order and that hold points not be passed until all previous steps have been performed and signed off and (2) liquid penetrant (PT) inspection be performed in accordance with procedure HNP-0-6919 and ultrasonic (UT) inspection be performed in accordance with a SCS procedure.

Contrary to the above, procedures for repair of RECIRC and RHR system pipe welds were not followed in that:

1. On January 18, 1983, numerous pieces of .035" diameter stainless welding material in lengths ranging from 1 or 2 inches to approximately 50 feet were left scattered over the drywell after completion of weld repairs.

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 3100
March 21, 1983
Page Two

VIOLATION (Continued)

2. On January 19, 1983, steps 19, 20 and 23 of procedure HNP-1-10174 had been signed off without steps 17, 18 and 21 being signed off.
3. On January 19, 1983, PT inspection had been performed in accordance with SCS procedure PT-H/F/V-600 and UT was being performed in accordance with LMT procedure UT-38.

This is a Severity Level IV Violation (Supplement I).

RESPONSE

Admission or denial of alleged violation: The violation occurred as stated in all three examples given.

Reason for the violation: The three examples cited in the Notice of Violation were failures to follow existing procedures.

For Example 1: The failure to properly control weld material was due to poor housekeeping. While pieces of weld wire were not kept picked up, this material was no longer being used in the automatic feed system of the welding operation. The failure to keep such material picked up was due to lack of attention to housekeeping requirements.

For Example 2: The failure to perform HNP-1-10174 sequentially was caused by personnel determining that the technical aspects of the procedure would not be altered by completing the steps in an order other than as specified by the procedure. While this determination was true, action should have been taken to have the procedure properly revised to allow such actions.

For Example 3: The nondestructive examination (NDE) procedures substituted for those listed in the repair procedure had been determined to be adequate for the required inspections. However, personnel did not take the proper actions required by existing plant procedure to have the repair procedure revised to allow for the use of these NDE procedures.

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 3100
March 21, 1983
Page Three

Corrective steps which have been taken and the results achieved: The steps that have been taken are administrative and disciplinary in nature. The personnel involved in the violation which resulted from the failure to follow procedures step-by-step have been counseled. All improper references to NDE procedures in the work packages have been corrected. A review has been completed to assure that technical acceptance requirements have been met.

Corrective steps that will be taken to avoid future violations: In the future, personnel or contractors who perform special projects for Plant Hatch will be thoroughly briefed on the use of and compliance with site requirements, rules, and guidelines. This will be accomplished through an interfacing of the personnel or contractor supervising personnel with the cognizant site departments to ensure that all parties involved are completely knowledgeable concerning procedural and administrative requirements.

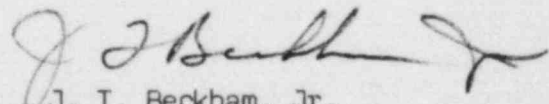
Housekeeping will be monitored, and contractors will be required to clean their work areas at least once per shift.

The Quality Control Department will monitor hold points and assure that deviations to procedures are controlled. Procedures used in special projects will be revised when necessary per existing plant procedures. Personnel are instructed on a continuing basis of the importance of compliance with procedure requirements.

Date when full compliance will be achieved: Full compliance was achieved on February 16, 1983, when all improper references to NDE procedures were corrected, completion of the remaining steps of the procedure were signed off, and the counseling of personnel was completed.

If you have any questions or require additional information, please contact this office.

Very truly yours,


J. T. Beckham, Jr.

JAE/mb

xc: L. T. Gucwa
H. C. Nix, Jr.
Senior Resident Inspector