

Georgia Power Company
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 877-7279

J. T. Beckham, Jr.
Vice President - Nuclear
Hatch Project



September 23, 1994

Docket No. 50-321

HL-4698

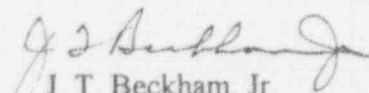
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Edwin I. Hatch Nuclear Plant - Unit 1
Reply To A Notice Of Violation

Gentlemen:

In response to your letter dated August 31, 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 94-16. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Sincerely,



J. T. Beckham, Jr.

JKB/et

Enclosure: Violation 94-16-01 and GPC's 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, Region II
Mr. S. D. Ebnetter, Regional Administrator
Mr. B. L. Holbrook, Senior Resident Inspector - Hatch

TEC

Enclosure

Edwin I. Hatch Nuclear Plant
Violation 94-16-01 and GPC's Response

VIOLATION 94-16-01

Criterion XVI of Appendix B of 10 CFR 50 requires that corrective action measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

Contrary to the above, corrective actions were not promptly identified in that vendor information received by the licensee in June 1986 was not implemented to correct Main Steam Line Flow Trip Instrument setpoints. This resulted in a violation of Technical Specification 3.2, Protective Instrumentation.

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

This violation is applicable to Unit 1 only.

RESPONSE TO VIOLATION 94-16-01

Admission or denial of the violation:

The violation occurred as described in the Notice of Violation. The incorrect Unit 1 main steam line high flow isolation setpoint was discovered by plant personnel during a review of a revision to the subject vendor information.

Reason for the violation:

The violation was caused by an untimely and inaccurate review of vendor information which occurred under past administrative practices.

In August 1986, and again in 1989, plant personnel initiated a Request for Engineering Assistance for offsite engineering personnel to review the General Electric Service Information Letter (SIL) concerning the main steam line high flow isolation setpoint. This is a standard practice since setpoint calculations are performed and maintained by offsite engineering personnel. The latter request was completed in March 1990.

Enclosure

Violation 94-16-01 and GPC's Response

Plant Hatch's Architect/Engineer, in responding to the Request for Engineering Assistance, incorrectly assumed that the analytical steam flow limit used in the main steam line high flow isolation setpoint was correct. This assumption was based on the knowledge that General Electric provided the original steam flow limit for isolation and General Electric's methodology was used to derive the flow instrument isolation setpoint. Architect/Engineer personnel did not verify that the high steam flow limit provided by General Electric, in fact, was correct as recommended by the SIL.

Georgia Power Company (GPC) personnel, in March 1990, did not require the Architect/Engineer to obtain conclusive evidence from General Electric that the concerns of the SIL had been addressed; i.e., that the analytical limit used in the setpoint derivations was correct. The response from the Architect/Engineer stated that this evidence could be obtained, if desired. However, GPC personnel did not require the Architect/Engineer to obtain the information.

In July 1994, during the review of a revision to the original SIL, it was discovered that the Unit 1 main steam line high flow isolation analytical limit and the associated flow instrument isolation setpoint were in error in the nonconservative direction.

Corrective steps which have been taken and the results achieved:

The Unit 1 and Unit 2 main steam line high flow isolation analytical limits have been reviewed. It was concluded that the Unit 2 limit was correct; however, the Unit 1 limit was found to be incorrect (too high). The correct limit was calculated and a new flow instrument isolation setpoint was derived based upon this limit. On 7/28/94, plant personnel adjusted the isolation setpoint on the 16, Unit 1 main steam line flow instruments to the correct value.

Plant administrative control procedure 10AC-MGR-005-OS, "Operating Experience Program and Corrective Action Program," requires, in general, that the initial SIL review be completed within 60 days of site receipt. This requirement was added to the procedure in a revision effective 5/5/93. A review of the revision to the original SIL, dated 5/17/94, performed per the requirements of procedure 10AC-MGR-005-OS, led to the discovery of the error in the Unit 1 main steam line high flow isolation setpoint.

Enclosure

Violation 94-16-01 and GPC's Response

Since the errors in the response to the SIL and its site acceptance occurred some years ago, personnel counseling was not considered to be an effective corrective action.

Corrective steps which will be taken to avoid further violations:

No additional corrective actions to prevent further violations are deemed necessary at this time.

Date when full compliance will be achieved:

Full compliance was achieved on 7/28/94 when the main steam line high flow isolation setpoint was changed to the correct value on the 16, Unit 1 main steam line flow instruments.