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June 14, 1991

U.S. Nuclear Regulatory Commission  
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Washington, D.C. 20555

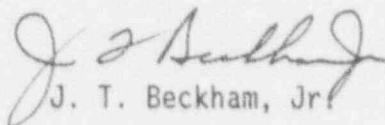
PLANT HATCH - UNITS 1,2  
NRC DOCKET 50-321, 50-366  
OPERATING LICENSES DPR-57, NPF-5  
RESPONSE TO SALP REPORT 91-07

Gentlemen:

As requested in your letter of May 9, 1991, which transmitted the Initial SALP Report for Plant Hatch, Georgia Power Company (GPC) is providing the attached comments for your consideration in preparation of your Final SALP Report. These comments reiterate the issues raised and discussed during our May 16, 1991, meeting.

Should you have any questions pertaining to these comments, please contact this office at any time.

Sincerely,

  
J. T. Beckham, Jr.

SJB/cr

Enclosure: GPC Response to Inspection Report 91-07 (SALP)

cc: (See next page.)

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U.S. Nuclear Regulatory Commission

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cc: Georgia Power Company

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

Mr. J. D. Heidt, Manager Engineering and Licensing - Hatch  
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

## ENCLOSURE

PLANT HATCH - UNITS 1, 2  
NRC DOCKETS 50-321, 50-366  
OPERATING LICENSES DPR-57, NPF-5  
GPC RESPONSE TO INSPECTION REPORT 91-07 (SALP)

The following comments on the Initial SALP Report for the period October 1, 1989 through March 2, 1991, are based on GPC's review of the report as well as discussions which occurred during the May 16, 1991, SALP presentation meeting held at Plant Hatch. These comments are formatted for ease of comparison with the SALP report.

### INTRODUCTION

We believe it is significant that there is only one individual common to both the current SALP board and the previous SALP board. Without more continuity from one period to the next, it is difficult to determine whether changes in performance are real or are simply the result of different perspectives from new reviewers.

### SUMMARY OF RESULTS

Page 2, first paragraph: "Control and monitoring of the operability of equipment during Technical Specification (TS) surveillance testing was a noted weakness". This statement infers that the operating staff was unaware of TS requirements for equipment operability which is not true. It is our understanding that this comment actually refers only to the issue of allowable out of service times for certain TS instrumentation and whether Action Statements should be entered when performing required testing. This practice is not inconsistent with others in industry. The NRC staff was aware of this practice and the previous NRC Senior Resident Inspector and Region II personnel had not noted a problem. GPC worked with the NRC staff to resolve the issue and is awaiting NRC-NRR staff action on a Technical Specification change which was submitted in February, 1991.

Page 2, third paragraph: "...several significant weaknesses were identified with procedures which failed to meet TS requirements...". During this SALP period, GPC continued its aggressive program to identify, resolve and report problems with procedures and surveillances. In doing so, some minor technical and procedural inadequacies were found and corrected. In addition, areas where personnel failed to follow procedures were found by GPC and corrected. It is important to note that the majority of these items were self-identified.

ENCLOSURE (Continued)

GPC RESPONSE TO INSPECTION REPORT 91-07 (SALP)

Page 2, fifth paragraph: "...there continued to be weaknesses in the identification of deficiencies by security supervisors.". This is an all encompassing statement when, in fact, the basis for this conclusion appears to be related to one "event" associated with preparations for the arrival of Hurricane Hugo in late 1989.

The other "example", which is mentioned on page 16 of the report, is a matter of opinion. The compensatory measures which were in place at the time of the referenced observation were in total compliance with the NRC approved Plant Hatch Physical Security Plan. The changes in the compensatory measure which were implemented following discussions with the NRC inspector were purely enhancements above and beyond regulatory requirements. These actions were taken in a good faith attempt to demonstrate to the inspector our willingness to respond to his comments.

Page 3, second paragraph: "...weaknesses in interpretations of regulatory requirements and reporting requirements were identified.". We agree that two of the examples used to support this conclusion are valid and prompt corrective action was taken at the time we became aware of the situation. The other two examples have been cited as weaknesses when the practices in question have long been known to various members of the NRC staff and we believe we previously had at least tacit approval. Region II had indicated that the review of the ESF reporting issue would be done as an improvement item since the NRC staff was aware of the situation. The issue related to not entering Action Statements when taking instruments out of service for required surveillance is also not unique to plant Hatch. It is of concern that these issues identified at Hatch as weaknesses are generic in nature; yet, there does not appear to be consistent implementation and enforcement throughout the nuclear industry.

We fully support the current initiative to issue revised guidance on reporting requirements and we will put increased upper management attention in this area.

PLANT OPERATIONS

We are concerned with the declining trend identified in the area of plant operations and we will put increased upper management attention in this area. The basis for the NRC trend determination appears to be primarily the reactor scrams that occurred in February 1991 over a very short time frame.

## ENCLOSURE (Continued)

### GPC RESPONSE TO INSPECTION REPORT 91-07 (SALP)

Page 7, second paragraph: "...inadequacies still exist in the basis for establishing setpoints used in some of the EOPs". This statement appears with no supporting information. To our knowledge, the only EOP setpoint at issue with the NRC is the EOP entry condition for primary containment hydrogen concentration. We maintain that the Plant Hatch specific value (2.5%) is fully consistent with the BWROG Emergency Procedure Guidelines and is adequate for its intended purpose. The use of 2.5% was reviewed and approved through the normal approval process which is consistent with the methodology allowed for EOP development and implementation. Furthermore, formal calculations exist which support the setpoint.

#### RADIOLOGICAL CONTROLS

We have no specific comments on this section of the report.

#### MAINTENANCE/SURVEILLANCE

Page 11, second paragraph: "A decrease in the level of performance, primarily attributable to a lack of attention to detail, occurred in the last several months of the assessment period." The examples which are cited in support of this conclusion are valid and are of concern to GPC management. Particularly, the events which occurred as the result of breakdowns in the independent verification program are felt to be most significant. We believe that the extensive corrective actions taken as a result of these events will significantly strengthen the program.

Page 12, third paragraph: "An insufficient emphasis was placed on completing required testing without reliance on the TS permitted grace period." The use of the surveillance interval grace period is not in conflict with regulatory requirements. In fact, the NRC has recently relaxed the grace period even further by deleting the "3.25 times the surveillance interval" provision previously found in Technical Specification 4.0.2. While the practice of scheduling last day surveillance has been discontinued in an effort to show responsiveness to the NRC, we wish to state that the way in which testing was being scheduled at Plant Hatch actually resulted in more frequent testing than strictly required by the Technical Specifications and was in compliance with the Technical Specifications. Plant Hatch had been scheduling on a "last day" basis but the due dates were not readjusted upon completion of each test. Thus, testing was done well within the time frames allowed by the Technical Specifications.



## ENCLOSURE (Continued)

### GPC RESPONSE TO INSPECTION REPORT 91-07 (SALP)

Page 12, fourth paragraph: " Numerous problems were identified with surveillance procedures during the assessment." During the assessment period, several LERs were submitted as a result of "missed surveillances". These reports include both events in which the surveillance clock expired prior to completion of the required test and events in which the surveillance procedure was found to be less than fully adequate. The majority of the events resulted from GPCs efforts to identify and correct problems with surveillance procedures.

During the SALP period, GPC completed the Procedure Upgrade Program (PUP) which identified and corrected numerous problems with plant procedures in general. However, although the PUP resulted in significant improvements, it did not identify every procedure problem. As a result, plant personnel have been performing a Commitment Tracking System verification effort since early 1990. In this effort, each Technical Specification requirement is being verified to be fully incorporated both technically and administratively, into plant procedures. This program has identified some instances where Technical Specification requirements were not totally incorporated into procedures. GPC will continue our aggressive program to identify procedural deficiencies associated with Technical Specifications. We would like to point out that this program has been identified as a strength during this and other NRC inspections.

#### EMERGENCY PREPAREDNESS

We have no specific comments on this area.

#### SECURITY AND SAFEGUARDS

Page 15, third paragraph: "...there continued to be failures on the part of the security shift supervisors to recognize deficiencies in the security program." The example cited had to do with temporary lighting which resulted from actions taken in preparation for the arrival of Hurricane Hugo in the Fall of 1989. To prevent unwanted damages during high winds, the temporary lighting was removed from some areas around the plant and the resulting reduction in illumination levels was not immediately recognized by the security staff. To our knowledge, this is the only example of inadequate compensatory action by security supervision.

ENCLOSURE (Continued)

GPC RESPONSE TO INSPECTION REPORT 91-07 (SALP)

The second issue raised in this paragraph of the SALP report involved an NRC inspection in February 1991. The inspector toured the plant site and reviewed compensatory post locations. Upon completion of his tour, the inspector mentioned possible areas for improvement related to compensatory posts around the plant perimeter and recommended that we review our actions against Security Plan requirements. Upon review, Security management determined that the requirements of the Security Plan were being implemented but that there were some areas which could be strengthened. Consequently, one compensatory post was added and some posts were slightly relocated. Security management viewed these actions as enhancements above and beyond the regulatory requirements and a good faith effort to demonstrate to the inspector our willingness to respond to his observations.

Page 16, fifth paragraph: "As mentioned in the previous SALP report, compensatory measures continue to tax the effectiveness of the security force." The circumstances surrounding the long term use of compensatory posts are totally different between the current and previous SALP periods. The previous SALP period included at least one situation wherein a compensatory post was required for a protracted period of time due to the lack of a solution to resolve a physical problem. That problem was corrected during this SALP period and the post was deactivated. The long term compensatory posts during this SALP period were related to our security system upgrade project. These compensatory posts were anticipated and were included in the planning process for the project. We are disappointed that the NRC apparently failed to recognize the significant expenditure of resources involved in the implementation of the security system upgrade project. However, we believe that the project has resulted in a significant improvement in the overall physical security of Plant Hatch.

Page 16, seventh paragraph: "Three of the changes either contained information which was not consistent with the requirements of 10CFR50.54(p) or required additional information to ensure commitments were clear and enforceable". The implication in this statement is that we are not aware of the requirements relating to changes to the Physical Security Plan. This implication is untrue. Some of the Plan changes which were submitted during this SALP period did require further discussion with the Region II staff; however, in general, we viewed these discussions as a part of the normal regulatory process to ensure that the requirements stated in the Plan were clear to both the NRC and GPC.

## ENCLOSURE (Continued)

### GPC RESPONSE TO INSPECTION REPORT 91-07 (SALP)

The changes submitted regarding access authorization were initially felt to be in conformance with 50.54(p). We believed at that time that the NRC endorsement of the NUMARC guideline was imminent and that the NRC agreed that changes in conformance with those guidelines did not represent a reduction in the level of protection provided by the Plan. When we became aware that the NRC might not agree with all of the conclusions in the NUMARC document, the proposed changes were withdrawn.

#### ENGINEERING/TECHNICAL SUPPORT

The examples of Technical Support deficiencies identified in this SALP report are, in general, self-identified. Again, it seems that the NRC should acknowledge the efforts to identify and resolve these issues rather than dwelling on the identification and resolution of these types of items. The comments with regard to the air compressor upgrade effort are substantially valid; however, the referenced event occurred prior to the new system being formally turned over to Operations. We agree that the project was not fully executed as well as expected.

This SALP did not mention several voluntary projects undertaken by GPC to enhance plant performance. The following is a listing of some of these initiatives which the NRC failed to consider in its assessment:

1. Security Computer Replacement
2. Configuration Management Program
3. Process Computer Replacement
4. Hydrogen Water Chemistry Project
5. Zinc Injection System
6. Rod Worth Minimizer Replacement
7. TIP Replacement
8. Reactor Vessel Level Indication Above 60 Inches
9. Replacement of Batteries and Chargers
10. Plant HVAC System Improvements
11. Feedwater Control System Improvements



ENCLOSURE (Continued)

GPC RESPONSE TO INSPECTION REPORT 91-07 (SALP)

12. NSSS Vendor Review of Design Change Packages
13. Industry Leadership On Several Issues Including BWROG Committee Chairmen in the Following Areas:
  - \* MOV Testing
  - \* Containment Leak Rate Testing
  - \* Shutdown Risk Management
  - \* LER/JCO Guidance
  - \* RPV Internals Inspection
  - \* BWR Maintenance

In addition, GPC has provided management and executive leadership in the BWROG as follows:

- \* EPG/Licensing Basis Resolution Task Force Chairman
- \* Executive Oversight Committee Vice Chairman
- \* BWROG Steering Committee Member
- \* Regulatory Response Group Member

SAFETY ASSESSMENT/QUALITY VERIFICATION

We believe it is significant that the NRC staff feels our programs for the identification of plant problems are strong. Weaknesses noted in this section relating to ESF reporting and entering Action Statements have been addressed in other sections of our response.

Our policy of not reporting a loss of ENS was based on the fact that we previously did not consider the loss of ENS to be a major loss of communication capability as described in 10CFR50.72. The past policy was that a "major loss" had not occurred if the backup telephone system is available. Our examination of the positions of others in the industry revealed that the Plant Hatch interpretation was not in general use by the industry and has thus been modified.