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Docket Nos. 50-321  
50-366

HL-4753

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

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

Gentlemen:

In response to your letter dated November 18, 1994, and in accordance with 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 94-26. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Sincerely,

J. T. Beckham, Jr.

JKB/et

Enclosures:

1. Violation 94-26-01 and GPC Response
2. Violation 94-26-02 and GPC Response
3. Violation 94-26-03 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, Region II

Mr. S. D. Ebnetter, Regional Administrator

Mr. B. L. Holbrook, Senior Resident Inspector - Hatch

TEO1

Enclosure 1

Edwin I. Hatch Nuclear Plant  
Violation 94-26-01 and GPC Response

VIOLATION 94-26-01

TS 6.8.1 requires, in part, that written procedures shall be established, implemented, and maintained covering the activities referenced in the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Rev. 2, dated February 1978. Paragraph 7.e(7) of Appendix A to Regulatory Guide 1.33 states that the licensee should have written radiation protection procedures for personnel monitoring.

Administrative Control Procedure No. 60AC-HPX-012-0S, titled "Overview of Radiological Work Practices and Radiation Protection ACPS," Rev. 1, dated October 8, 1991, states, in part, that this procedure provides an overview of information that is presented in more detail in other procedures with objectives for providing abbreviated information from other existing plant procedures to increase worker awareness of radiological work practices and this (sic) improve radiological work practices in the plant.

Section 8.1.1.5 of "Dosimetry" to Administrative Control Procedure No. 60AC-HPX-012-0S states that individuals wear the TLD and dosimeter on the front of the body, no further than a hand's width apart AND between your shoulders and waist, UNLESS instructed differently by HP.

Contrary to the above, on October 18-20, 1994, the inspector observed several individuals not wearing their TLDs and DADs on the front of their body, no further than a hand's width apart and between their shoulders and waist. Specifically, the inspector observed several individuals with their DAD clipped on the side of their waist while their TLD was located on the front of their chest.

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

RESPONSE TO VIOLATION 94-26-01

Admission or denial of the violation:

The violation occurred as described in the Notice of Violation.

Enclosure 1  
Violation 94-26-01 and GPC Response

Reason for the violation:

This violation was caused by a cognitive failure of some personnel to follow plant procedural requirements and appropriate radiological worker practices regarding the placement of dosimetry. Georgia Power Company (GPC) currently uses two monitors on each individual to provide external radiological exposure monitoring and tracking of dose for personnel entering radiological controlled areas. The thermoluminescent detectors (TLDs) are read quarterly and serve as the official exposure record. Digital alarming dosimeters (DADs) are read upon exit from a radiological controlled area and serve as a means for tracking an individual's cumulative exposure on a day-to-day basis. Although trained on and therefore knowledgeable of requirements concerning the placement of DADs and TLDs, and although the individuals were wearing both monitoring devices, some personnel did not properly place their DADs and TLDs in the required near proximity to each other at all times.

Corrective steps which have been taken and the results achieved:

Plant Management issued a letter to all plant personnel on 10/26/94, reiterating the procedural requirements regarding the proper wearing of dosimetry. Using this and other methods, management has emphasized, and will continue to emphasize, compliance with procedural requirements concerning the wearing of DADs and TLDs. Health Physics, supervisory, and management personnel correct on-the-spot any persons not properly wearing dosimetry. Incidents of procedural non-compliance are and will continue to be handled per GPC's Positive Discipline Program where appropriate.

Corrective steps which will be taken to avoid further violations:

Senior plant management will conduct meetings with plant employees to emphasize the radiological work practices that are expected to be carried out. The meetings are scheduled to be completed by 3/31/95. In addition, plant supervision and management will continue to monitor compliance with requirements for the wearing of dosimetry and to correct incidents of non-compliance when noted. The Positive Discipline Program will be used when appropriate.

Date when full compliance will be achieved:

Plant management and supervision continuously emphasize the requirement to comply with procedures for radiological work practices.

Enclosure 2

Edwin I. Hatch Nuclear Plant  
Violation 94-26-02 and GPC Response

VIOLATION 94-26-02

Technical Specifications (TS) 6.8.1 requires, in part, that written procedures shall be established, implemented and maintained covering the activities referenced in the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision (Rev.) 2, dated February 1978. Paragraph 7.e(4) of Appendix A to Regulatory Guide 1.33 states that the licensee should have written radiation protection procedures for contamination control.

Administrative Control Procedure No. 60AC-HPX-004-0S, titled "Radiation and Contamination Control," Rev. 13, dated January 1, 1994, states, in part, that this procedure establishes the requirements and responsibilities for monitoring and controlling exposure to radiation and contamination.

Section 8.3.2.4 of "Personnel Monitoring" to Administrative Control Procedure No. 60AC-HPX-004-0S states that all personnel must survey their personal articles when performing personnel monitoring. Personal articles will include such articles as dosimetry, notebooks, flashlights and handtools but will not include plant equipment or material with potentially contaminated internal surfaces.

Section 8.3.2.5 of "Personnel Monitoring" to Administrative Control Procedure No. 60AC-HPX-004-0S states that Health Physics (HP) must be notified whenever contamination is detected on any individual or their personal articles. Paper booties and latex gloves will normally be found in the sides of the frisker box. Put these on, go to the nearest phone and contact HP. Personnel are to remain at the location from where they contacted HP and attempt not to spread the contamination. An HP will come to that area and survey the person and/or area for contamination. Inform HP of the location and nature of the contamination.

Contrary to the above, on October 19, 1994, several individuals were observed by the inspector at the C52 entrance of the Turbine Building to not survey their personal articles nor notify HP when a PCM1 alarm was enunciated. Specifically, the individuals observed by the inspector exited the PCM1s located in the potentially contaminated radiation controlled area (RCA) into the clean non-RCA. Those individuals observed by the inspector did not survey themselves and personal articles nor notify HP when the PCM1

Enclosure 2

Violation 94-26-02 and GPC Response

alarms were enunciated indicating that contamination was detected on them or their personal articles. The individuals observed by the inspector continued on through the PCMI's while the alarms were still enunciated and exited the potentially contaminated RCA into the clean non-RCA.

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

RESPONSE TO VIOLATION 94-26-02

Admission or denial of the violation:

The violation occurred as described in the Notice of Violation, except that C52 is the entrance to the Control Building and not the Turbine Building as stated in the Notice of Violation.

Reason for the violation:

This violation was caused by a cognitive failure of some personnel to follow plant procedural requirements and appropriate radiological worker practices regarding frisking. Although trained on and therefore knowledgeable of requirements concerning the frisking of personal articles and the proper actions to be taken when an alarm is received on a PCMI, some personnel failed to frisk their personal articles or notify Health Physics personnel prior to exiting the radiological controlled area when alarms were received on a PCMI during a whole-body frisk.

Corrective steps which have been taken and the results achieved:

Plant management issued a letter to all plant personnel on 10/26/94, reiterating the procedural requirements regarding frisking. Additionally, video cameras have been installed at the four exit points from the radiologically controlled area and at the only exit point from the Protected Area. The cameras can be monitored by Health Physics personnel and the video tapes produced by the cameras are reviewed periodically for compliance with procedural requirements. Violations are handled per GPC's Positive Discipline Program where appropriate. Since the cameras have been installed, three persons, two contract employees and one GPC employee, have been observed not frisking properly; all three were terminated.

Enclosure 2  
Violation 94-26-02 and GPC Response

Corrective steps which will be taken to avoid further violations:

Senior plant management will conduct meetings with plant employees to emphasize the radiological work practices that are expected to be carried out. The meetings are scheduled to be completed by 3/31/95. In addition, plant supervision and management will continue to monitor compliance with requirements for frisking and to correct incidents of non-compliance when noted. This monitoring may or may not involve the continued use of video cameras as determined by management. The Positive Discipline Program will be used when appropriate.

Date when full compliance will be achieved:

Plant supervision and management continuously emphasize the requirement to comply with procedures for radiological work practices.



### Enclosure 3

#### Edwin I. Hatch Nuclear Plant Violation 94-26-03 and GPC Response

##### VIOLATION 94-26-03

TS 6.8.1 requires, in part, that written procedures shall be established, implemented and maintained covering the activities referenced in the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Rev. 2, dated February 1978. Paragraph 7.e(4) of Appendix A to Regulatory Guide 1.33 states that the licensee should have written radiation protection procedures for contamination control.

Administrative Control Procedure No. 60AC-HPX-012-0S, titled "Overview of Radiological Work Practices and Radiation Protection ACPS," Rev. 1, dated October 8, 1991, states, in part, that this procedure provides an overview of information that is presented in more detail in other procedures with objectives for providing abbreviated information from other existing plant procedures to increase worker awareness of radiological work practices and thus improve radiological work practices in the plant.

Section 8.1.3.7 of "Contamination Control" to Administrative Control Procedure No. 60AC-HPX-012-0S states that individuals do NOT reach or step across any contaminated boundaries UNLESS Health Physics is present and the activity is carried out in a controlled manner so as to prevent the spread of contamination.

Contrary to the above, on October 19, 1994, the inspector observed several individuals at the Unit 1 drywell entrance reaching across a contaminated RCA boundary. Specifically, the inspector observed several individuals with either pen or paper in hand reach across the contaminated RCA boundary at the Unit 1 drywell access point while having discussions with other individuals and observing activities being conducted in that area. Furthermore, individuals were observed leaning on the potentially contaminated stanchions used to establish the contaminated RCA boundary.

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

##### RESPONSE TO VIOLATION 94-26-03

###### Admission or denial of the violation:

The violation occurred as described in the Notice of Violation.

Enclosure 3  
Violation 94-26-03 and GPC Response

Reason for the violation:

This violation was caused by a cognitive failure of some personnel to follow plant procedural requirements and appropriate radiological worker practices regarding proper actions at radiological controlled area boundaries. Although trained on and therefore knowledgeable of requirements concerning correct and incorrect actions at contaminated radiological controlled area boundaries, some personnel failed to follow these requirements.

Corrective steps which have been taken and the results achieved:

Plant management issued a letter to all plant personnel on 10/26/94, reiterating the procedural requirements regarding the proper actions at contaminated radiological controlled area boundaries. Using this and other methods, management has emphasized, and will continue to emphasize, compliance with procedural requirements concerning actions at these boundaries. Health Physics, supervisory, and management personnel correct on-the-spot any persons not adhering to these requirements. Incidents of procedural non-compliance are and will continue to be handled per GPC's Positive Discipline Program where appropriate.

Corrective steps which will be taken to avoid further violations:

Senior plant management will conduct meetings with plant employees to emphasize the radiological work practices that are expected to be carried out. The meetings are scheduled to be completed by 3/31/95. In addition, plant supervision and management will continue to monitor compliance with requirements concerning contaminated radiological controlled area boundaries and to correct incidents of non-compliance when noted. The Positive Discipline Program will be used as appropriate.

Date when full compliance will be achieved:

Plant management and supervision continuously emphasize the requirement to comply with procedures for radiological work practices.