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

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
RESPONSE TO INSPECTION REPORT 91-13

Gentlemen:

In response to your letter of June 17, 1991, and in accordance with the provisions of 10 CFR 2.201, Georgia Power Company (GPC) is submitting the enclosed response to the Notice of Violation associated with NRC Inspection Report 91-13. A copy of this response is being provided to NRC Region II for review. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Should you have any questions regarding the submittal, please contact this office.

Sincerely,

J. T. Beckham, Jr.

SRP/sp

Enclosure: Violation 91-13-01 and GPC Response

c: Georgia Power Company
Mr. H. L. Sumner, General Manager - Nuclear Plant
Mr. J. D. Heidt, Manager Engineering and Licensing - Hatch
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ENCLOSURE

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
VIOLATION 91-13-01 AND GPC RESPONSE

VIOLATION 91-13-01

Technical Specification (TS) 6.12.1 requires that in lieu of the "control device" or "alarm signal" required by Paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of the radiation is greater than 100 mrem/hr but less than 1,000 mrem/hr shall be barricaded and conspicuously posted or a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Any individual or group of individuals permitted to enter each such areas shall be provided with or accompanied by one or more of the following:

1. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

2. A radiation monitoring device which continuously integrates the radiation dose rated in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rates level in the areas has been established and personnel have been made knowledgeable of them.

3. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the areas and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physics (HP) supervision in the RWP.

Licensee Administrative Control Procedure 60AC-HPX-004-0S, Radiation and Contamination Control, Revision 8, Step 8.1.3.3 repeats the above listed TS requirements.

Contrary to the above, in the following examples, individuals entered posted high radiation area without TS required controls:

1. On March 25, 1991, a Plant Equipment Operator (PEO) was in the Unit 1 Reactor Core Isolation Cooling (RCIC) system pump room when the RCIC pump was in operation. This area is a high radiation area during RCIC operation.

2. On April 3, 1991, a PEO was observed in a posted high radiation area in the Unit 2 Reactor Building 185' elevation.

3. On April 23, 1991, a PEO was observed in the Control Rod Drive upper catwalk, a posted high radiation area.

VIOLATION 91-13-01 AND GPC RESPONSE

4. On April 24, 1991, two Building and Grounds personnel were discovered in a posted high radiation area.

These are examples of a repeat violation.

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

RESPONSE TO VIOLATION 91-13-01

Admission or denial of the violation:

The violations occurred as described in the Notice of Violation. However, the wording of Example 2 requires clarification. That is, the determination the PEO was contaminated was made after he had exited a High Radiation Area. The PEO was not actually observed in the Unit 2 Reactor Building 185 ft elevation

Reason for the violation:

The violations were caused by personnel error. In Example 1, miscommunication between Health Physics and Operations personnel resulted in the following:

1. The RCIC system pump room was not posted as a High Radiation Area prior to the RCIC pump operability test as required by procedure.

2. During RCIC pump operation, a PEO was in the RCIC pump room without having met the requirements for entering a High Radiation Area. In Examples 2, 3, and 4, personnel failed to obey the properly posted High Radiation Area signs. Contributing to the personnel errors in these three events were lack of uniqueness in High Radiation Area signs versus other radiological signs and misunderstandings between Health Physics personnel and workers regarding entry requirements and specific work locations.

Corrective steps which have been taken and the results achieved:

As a result of these events, the following corrective actions have been taken:

1. Involved personnel were counseled, as appropriate, regarding the need to read and follow all Health Physics postings and procedural requirements, and to ensure communications are clearly understood by all involved parties.

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2. On 4/25/91, the General Manager - Nuclear Plant halted work in High Radiation Areas until plant personnel could be retrained on the requirements governing entry into High Radiation Areas. Before personnel were allowed to re-enter and continue work in a High Radiation Area, they were required to attend special training sessions addressing entry requirements and the consequences of unauthorized entry into High Radiation Areas.

   Upon completion of the training sessions, each plant employee was required to sign a statement indicating he/she clearly understood the requirements governing entry into High Radiation Areas and the consequences of failure to adhere to those requirements. Any individual who fails to comply will be subjected to formal disciplinary action. Also, Health Physics personnel were instructed to deny a person access to a High Radiation Area unless the individual has been retrained on the requirements governing entry into High Radiation Areas.

3. To maintain the awareness of High Radiation Area entry requirements and the consequences of failure to adhere to those requirements, personal responsibilities and accountabilities similar to those in the previously described statement were incorporated into new and annual General Employee Training (GET). This action completed 6/7/91, ensures new employees are made aware, and present employees continue to be aware, of High Radiation Area entry requirements and the consequences of failure to adhere to them. Unescorted plant access is not granted unless the employee passes GET.

4. Although High Radiation Areas have been and are currently posted in compliance with applicable regulatory requirements and sound radiological practices, additional signs having unique shapes have been ordered. The unique shape of the signs will make them more conspicuous, thereby enabling personnel to readily identify High Radiation Areas and Very High Radiation Areas. The High Radiation Area signs will be triangular in shape (YIELD sign), and the Very High Radiation Area signs will be octagonal (STOP sign). Supplemental warnings will appear on the signs. The new signs will be received and posted, and the applicable plant procedures governing their use will be revised by 8/2/91.

5. Plant Health Physics personnel evaluated the doors leading directly to High Radiation Areas personnel to determine whether the doors could be locked, thereby providing additional barriers. As a result of the review, four doors were locked and added to the daily and quarterly surveillance procedures for High Radiation Area doors. The door keys also were added to the High Radiation Area door key inventory.

VIOLATION 91-13-01 AND GPC RESPONSE

6. The contract Health Physics training program was reviewed to ensure it addresses adequately the requirements for entry into High Radiation Areas. The review resulted in several questions on High Radiation Area entry requirements being added to the tests required for contract Health Physics technicians.

7. Unit 1 and Unit 2 High Pressure Coolant Injection (HPCI) and RCIC pump surveillance procedures are being revised to add steps and applicable signoffs to ensure the appropriate areas are posted as High Radiation Areas prior to the pumps being run for surveillance purposes. These revisions will be issued by 7/31/91.

Corrective steps which will be taken to avoid further violations:

No further corrective actions are necessary to prevent recurrence.

Date when full compliance will be achieved:

Plant Hatch presently is in full compliance with all regulatory and procedural requirements regarding High Radiation Area entries.