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the southern electric system

NED-84-056

February 8, 1984

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

REFERENCE:
RII: JPO
50-321/50-366
I&E Report
83-35/83-38

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

Georgia Power Company hereby provides the following information in response to the violation cited in NRC I & E Inspection Report Nos. 50-321/83-35 and 50-366/83-38 dated January 11, 1984. The violation applied only to Hatch Unit 2 and was cited as a result of the NRC inspection conducted on November 24 - December 16, 1983 by Messrs. R.V. Crlenjak, P. Holmes-Ray, and J.F. Rogge of your office.

VIOLATION

10CFR50, Appendix B, Criterion V, as implemented in Hatch Unit 2 FSAR Section 17.2.5 requires, in part (sic), that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances.

Contrary to the above, on June 6, 1983 through June 18, 1983, work on the residual heat removal system testable check valve, 2E11-F050B, was performed without documented instructions, procedures or drawings appropriate to the circumstances in that the maintenance request procedure, MR-8 (sic), as utilized under maintenance request number 2-83-3188, did not prevent the reversal of the air actuator airlines (sic).

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RESPONSE

Admission or Denial of Alleged Violation:

The violation occurred.

Reason for the Violation:

The Maintenance Request (MR) issued to control work on the residual heat removal system testable check valve, 2E11-F050B, did not provide adequate instructions to ensure that the work was performed properly. The review process did not prevent the MR from being issued with inadequate instructions. Personnel did not perform an adequate functional test in accordance with MR 2-83-3188. As a result, the valve was returned to service with the air actuator air lines reversed.

Corrective Steps Which Have Been Taken and the Results Achieved:

On October 28, 1983, during performance of the "RHR VALVE OPERABILITY" procedure, personnel discovered that the air actuator air lines were reversed. The air lines were reinstalled properly and 2E11-F050B was satisfactorily tested and returned to service.

An investigation of this event determined the need for generic corrective actions to prevent the future issuance of MR's with inadequate work instructions and functional tests.

Interim Corrective Actions:

On January 30, 1984, a Management Overview Committee was established to review all safety-related MR's for proper work instructions and adequacy of functional test requirements prior to work being performed. The committee is made up of selected senior personnel from the Engineering, Operations, Quality Assurance and Quality Control Departments. Standing Order 84-5, issued January 31, 1984, provides direction as to the function of the Management Overview Committee in the review process.

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All safety-related MR's processed after January 30, 1984, are being reviewed by the committee. Emergency work (i.e., applicable to plant safety, plant shutdown, or public safety) covered by MR's can be approved by the Hatch Duty Officer or Operation Supervisor on shift if the Duty Officer cannot be contacted. Committee review of these MR's will be performed on the next regularly scheduled work day. As of February 3, 1984, all safety-related MR's with work in progress and work not yet started will be returned and reviewed by the committee prior to work continuing. Upon completion of the work, the committee will perform a second review to assure adherence to the work instructions before the functional test is performed.

Corrective Steps Which Will Be Taken to Avoid Future Violations:

The entire maintenance work order process has been changed to require that all MR's pass through a centralized group for review and processing. This group, Maintenance Planning and Scheduling, which consists of representatives from Operations, Maintenance, Quality Control and Health Physics has been charged with the responsibility of ensuring that all MR's contain sufficient information for work to be done properly and that functional tests are adequate. In addition, briefing of maintenance supervisory personnel on the new process and requirements was completed by February 3, 1984. Until the new process can ensure an adequate MR review and processing, the Management Overview Committee will be responsible for reviewing safety-related MR's.

Date When Full Compliance Was Achieved:

Full compliance was achieved on February 3, 1984, when all safety related MR's, were placed under the control of the Management Overview Committee.

Should you have any questions in this regard, please contact this office.

Sincerely yours,



L. T. Gucwa

JAE/mw

xc: J. T. Beckham, Jr.

H. C. Nix, Jr.

Senior Resident Inspector