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Georgia Power
the southern electric system

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Docket No. 50-366

HL-5080

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

Edwin I. Hatch Nuclear Plant - Unit 2
*Reply to a Notice of Violation*

Gentlemen:

In response to your letter dated November 9, 1995, 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 95-21. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Sincerely,

J. T. Beckham, Jr.

JKB/eb

Enclosure: Violation 95-21-01 and GPC Response

cc: *Georgia Power Company*
Mr. H. L. Sumner, Jr., 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. Ebneter, Regional Administrator
Mr. B. L. Holbrook, Senior Resident Inspector - Hatch

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Enclosure

Edwin I. Hatch Nuclear Plant - Unit 2
Violation 95-21-01 and GPC Response

VIOLATION 95-21-01

10 CFR 50, Appendix B, Criteria IX, requires in part that, measures shall be established to assure that special processes, including non-destructive testing are controlled and accomplished using qualified procedures in accordance with applicable Codes.

Paragraph T-434.1.4 of Section V, Article IV to the American Society of Mechanical Engineers (ASME) Code requires that, the surface finish on the calibration block shall be representative of the surface finishes of the component.

Paragraph T-432.1 of Section V Article IV to the ASME Code requires in part that, calibration shall include the complete ultrasonic system. The original calibration must be performed on the basic calibration block and calibration checks shall also include the entire examination system.

Paragraph IWA-2240 of Section XI of the ASME Code allows alternative examination methods other than [sic] those delineated in the Code to be used provided the Authorized Nuclear Inspector is satisfied that the results are demonstrated to be equivalent or superior to those of the specified method.

Contrary to the above:

1. On October 10, 1995, examination of Georgia Power Company's calibration blocks for the reactor pressure vessel revealed that they were smooth and unpainted while the reactor pressure vessel was painted with various thicknesses [sic] of paint and surface finishes.
2. On October 4, 1995, observation of the GERIS ultrasonic system calibration checks revealed that GE used different cables for calibration and calibration checks than those used for the reactor vessel examinations. Although, a comparison was made, the examination cables were never part of the system calibration and the alternative method was not demonstrated to the Authorized Nuclear Inspector.
3. On October 4, 1995, GE's Examination Procedure No. UT-HAT-702V0 Rev. 1, was noted to reference paragraph IWA-2240 of ASME Section XI, to [sic] allow for deviation from ASME Section V, Article 4 Paragraph T-433.2, requirements for amplitude correction during 12 hour calibration re-checks. The deviation to Code requirements had not been demonstrated to the Authorized Nuclear Inspector.

This is a Severity Level IV [sic] violation (Supplement ).

RESPONSE TO VIOLATION 95-21-01

**Reason for the violation:**

Violation Example 1

This example of the violation was caused by personnel error. Responsible inservice testing personnel failed to ensure the calibration block surface finish was representative of the surface to be inspected as required by the ASME Code.

Violation Example 2

This example of the violation was caused by less-than-adequate documentation of the demonstration of the alternative calibration process for the GERIS 2000 ultrasonic system. The Authorized Nuclear Inservice Inspector was aware of and had witnessed system calibrations using the alternative process. The Authorized Nuclear Inservice Inspector considered the alternative calibration process to be acceptable. However, demonstration of the alternative method and approval by the Authorized Nuclear Inservice Inspector were not properly documented.

Violation Example 3

This example of the violation was caused by less-than-adequate documentation of the demonstration of alternative examination methods. The Authorized Nuclear Inservice Inspector was aware of, and considered this exception to ASME Code requirements regarding the loss-of-amplitude deviation in calibration checks to be acceptable. However, demonstration of the alternative method and approval by the Authorized Nuclear Inservice Inspector were not properly documented.

**Corrective steps which have been taken and the results achieved:**

Violation Example 1

As a result of this event, the following actions were taken:

1. The calibration blocks were painted using a paint similar to the paint used on the surface to be examined. The GERIS 2000 ultrasonic system was calibrated on the blocks both before and after the blocks were painted, and the calibration results were compared. The maximum signal attenuation caused by the painted surface was 1.9 decibels (dB), a level within the ASME Code-allowable deviation of 2.0 dB. The variation did not significantly affect the data recorded during examinations. The two calibrations were witnessed and accepted by the Authorized Nuclear Inservice Inspector.

2. A clad response comparison was performed to assess the ultrasonic response of the clad deposit (clad roll) from painted and unpainted surfaces on the reactor pressure vessel wall. The resulting signal deviations were less than those found in the calibration block comparison discussed in item 1 above. No loss of contact was evident. Based on the clad response comparison and the results of the calibrations described in item 1, no additional examinations were required.
3. Responsible personnel were made aware of their error and its consequences.

Violation Example 2

As a result of this event, the following actions were taken:

1. The calibration process for the GERIS 2000 ultrasonic system was demonstrated to the satisfaction of the Authorized Nuclear Inservice Inspector. The successful demonstration of the calibration process and approval by the Authorized Nuclear Inservice Inspector were documented as an alternative method allowed by ASME Code, Section XI, paragraph IWA-2240.
2. Procedure UT-HAT-702V0 was revised to clearly identify the applicable portions of the ultrasonic system calibration process representing an alternative method allowed by ASME Code, Section XI, paragraph IWA-2240.

Violation Example 3

As a result of this event, the following actions were taken:

1. Procedure UT-HAT-702V0 was revised to allow only a 2.0 dB deviation per the applicable requirements of the ASME Code.
2. The calibration check records were reviewed, and all checks were within the ASME Code-allowable deviation of 2.0 dB. Examinations conducted to date have been within the allowable deviation of 2.0 dB; therefore, no additional examinations were required. As the examinations were within the Code-allowable deviation, documented approval by the Authorized Nuclear Inservice Inspector is not applicable.

**Corrective steps which will be taken to avoid further violations:**

No additional corrective actions to prevent further violations are necessary.

**Date when full compliance will be achieved:**

Full compliance with applicable ASME Code requirements was achieved as a result of the previously described actions.