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Georgia Power

the southern electric system

NED-85-118
1469N

March 11, 1985

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
101 Marietta Street, NW
Atlanta, Georgia 30323

REFERENCE:
RII: RDW
50-321/50-366
IER 84-48

ATTENTION: Dr. J. Nelson Grace

GENTLEMEN:

Georgia Power Company hereby provides the following information in response to the violation cited in NRC I&E Report 50-321/84-48 and 50-366/84-48 dated January 31, 1985 as amplified by the notice of violation transmitted February 8, 1985. The subject violations were identified during the NRC inspection conducted at Plant Hatch by Mr. Holmes-Ray of your staff on November 21, through December 20, 1984.

VIOLATION 1:

Technical Specification (TS) 6.8.1 requires that procedures be established, implemented and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978. Section 9 of Regulatory Guide 1.33 covers procedures for performing maintenance.

Contrary to the above, on November 29, 1984, procedure HNP-501, Equipment Clearance and Tagging, was not properly implemented in that work was started requiring a clearance without a clearance being issued and this improper work start resulted in a Unit 2 scram.

This is a Severity Level IV violation (Supplement I-D-2).

RESPONSE TO VIOLATION 1:

Admission or denial of alleged violation: The violation occurred.

Reason for the violation: The improper work control associated with the removal of the subject differential pressure instrument from service and the resultant reactor scram on Unit 2 was the result of personnel error and a violation of procedures. A misunderstanding between supervisory personnel resulted in permission to work on the instrument without a clearance.

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(RESPONSE TO VIOLATION 1, continued)

Corrective steps which have been taken and the results achieved: The responsible individual was issued a letter of reprimand for allowing the work to proceed without proper clearance. The action of allowing work to proceed was in contradiction of the Maintenance Work Order, which specifically indicated that clearance must be granted, and allowed unauthorized personnel to operate valves in a system supporting an operating plant. Construction Coordinators were briefed on the incident, and personnel involved in modifications work were instructed to take the necessary precautions when working on an operating unit. Those personnel directly involved with the clearance were instructed on the importance of acquiring the proper clearances.

Corrective steps which will be taken to avoid further violations: This is an isolated incident and the above actions are sufficient to prevent recurrence.

Date when full compliance was achieved: Full compliance was achieved on November 29, 1984, when the appropriate clearances were issued and the work completed in accordance with procedures.

VIOLATION 2:

TS 3.4.3.2 (as supplemented by Confirmatory Order of July 8, 1983) requires that primary containment floor drain sump and equipment sump levels and flow rates be monitored at least once per four hours to ensure reactor coolant system leakage is within TS specified limits; if not, take the applicable TS actions. Surveillance procedure HNP-2-1050 implements this TS requirement to determine the drywell unidentified leak rate by collecting the floor drain integrator reading and calculating the corresponding leak rate every four hours.

Contrary to the above, on December 13, 1984, the 2400-hour floor drain integrator reading was taken but the corresponding leak rate was not calculated, nor identified as exceeding TS limits, until approximately 0410 hours on 12/14/84. Even though the TS limiting condition for operation (LCO) action step was not violated, the failure to make the required calculations resulted in the plant being in a TS LCO action step approximately four hours before it was finally realized by the operators.

This is a Severity Level IV violation (Supplement I-D-2).

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RESPONSE TO VIOLATION 2:

Admission or denial of alleged violation: The violation occurred.

Reason for the violation: The required drywell floor drain leak rate was not calculated as a result of failure to follow procedure HNP-2-1050, Surveillance Checks, due to a Plant Hatch employee's oversight. The employee failed to determine the leak rate at the required four hour intervals and thus, failed to identify the leak rate as exceeding TS limits.

Corrective steps which have been taken and the results achieved: The required calculations were performed immediately upon discovery of the error. Prior to discovery, the required corrective actions had been taken to reduce floor drain leakage to within TS limits by backseating the RCIC steam supply inboard isolation valve, which had caused the increased leakage rate. The procedure for the leakage calculations was verified to be adequate. The responsible employee and his immediate supervisors were instructed in the requirements for correctly performing procedures.

Corrective steps which will be taken to avoid further violations: The above actions and notoriety of the incident are sufficient to prevent recurrence.

Date when full compliance was achieved.: Full compliance was achieved at 0600 on December 14, 1984, when drywell floor drain leak rate was determined to be less than TS limits.

VIOLATION 3:

10 CFR 50.73(a)(2)(ii)(A) requires a License Event Report (LER) be submitted within 30 days for an event that results in a power plant being (A) in an unanalyzed condition that significantly compromised plant safety.

Contrary to the above, a LER was not submitted within 30 days when the bolting material in Residual Heat Removal service water pumps was found to be improper. The test results were available to Georgia Power Company on October 15, 1984, and the LER was not submitted until December 4, 1984.

This is a Severity Level V violation (Supplement I-E).

RESPONSE TO VIOLATION 3:

Admission or denial of alleged violation: The violation occurred.

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(RESPONSE TO VIOLATION 3, continued)

Reason for the violation: The failure to meet the reporting time limit for LER 366-84-32 was the result of personnel errors. Communications between the Nuclear Regulatory Commission (NRC) and Georgia Power Company occurred via telephone, September 25, 1984, and by Georgia Power Company letters (NED-84-510 and 512) dated September 26 and 27, 1984, in regard to this event. Personnel involved in the incident incorrectly assumed that the above letters were sufficient formal notification to the NRC, and that Regulatory Compliance Department could finalize a special report without a Deficiency Report (DR). The reportability issue was further clouded because the inadequate bolting materials were changed out using acceptable material on September 28, 1984, prior to receipt of the test results. In addition, once the DR was initiated, personnel in the LER processing chain failed to recognize that the event discovery date should have been October 15, 1984, and not November 5, 1985, as noted in the DR.

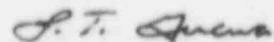
Corrective steps which have been taken and the results achieved: The required reports were issued upon determination of reportability. The responsible personnel were instructed as to the requirements for writing a DR. All appropriate Hatch Plant personnel were given training on timely reporting of deficiencies via a management initiated Departmental Directive.

Corrective steps which will be taken to avoid further violation: This is an isolated incident and the above actions are sufficient to prevent recurrence.

Date when full compliance was achieved: Full compliance was achieved on December 4, 1984, when all required reports were made.

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

Very truly yours,



L. T. Gicwa

xc: H. C. Nix, Jr.
Senior Resident Inspector