

Georgia Power Company
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 877-7279

J. T. Beckham, Jr.
Vice President - Nuclear
Hatch Project



Georgia Power

the southern electric system

HL-2940
004083

October 7, 1992

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

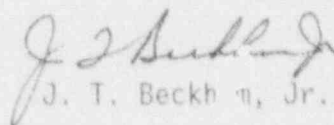
PLANT HATCH - UNIT 2
NRC DOCKET 50-366
OPERATING LICENSE NPF-5
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

In response to your letter of September 11, 1992 and in accordance with the provisions of 10 CFR 2.201, Georgia Power Company (GPC) is providing the enclosed response to the Notice of Violation associated with Inspection Report 92-18 and the Enforcement Conference held on September 8, 1992. A copy of this response is being provided to NRC Region II for review. In the enclosures, a transcription of the NRC violation precedes GPC's response.

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

Sincerely,


J. T. Beckham, Jr.

JKB/cr

Enclosures

cc: (See next page.)

9210140241 921007
PDR ADDCK 05000336
G PDR

TEC 11/1

U.S. Nuclear Regulatory Commission
October 7, 1992
Page Two

cc: Georgia Power Company
Mr. H. L. Sumner, General Manager - Nuclear Plant
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. Ebner, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

ENCLOSURE 1

PLANT HATCH - UNIT 2
NRC DOCKET 50-366
OPERATING LICENSE NPF-5
VIOLATION 92-18-04 AND GPC RESPONSE

VIOLATION 92-18-04

Technical Specification (TS) 3.8.2.3 requires that Division I and Division II of the D. C. power system shall be operable. Division I consists of the 2A 125/250V battery and at least two full capacity chargers. With one of the required divisions of DC power inoperable, restore the inoperable division to operable status within 2 hours or be in at least hot shutdown within the next 12 hours and in cold shutdown within the following 24 hours.

TS 4.8.2.3.2 contains specific operability criteria for the batteries and the chargers.

Contrary to the above, during the period of July 12 - July 16, 1992, the 2B and 2C battery chargers were not operable at full capacity for a period of at least 18 hours.

This is a Severity Level IV violation. (Supplement 1)

RESPONSE TO VIOLATION 92-18-04

Admission or denial of the violation:

The violation occurred as described in the Notice of Violation.

Reason for the violation:

The violation was caused by personnel error, a less than adequate procedure, and component failure.

On 7/12/92, a Plant Equipment Operator performing procedure 34GO-OPS-030-2S, "Daily Inside Rounds," failed to identify that the output voltage of the 2B Station Service Battery Charger was out of procedural specification. He recorded the charger output voltage but did not notice the reading was outside of the limits given in the procedure. Consequently, he failed to bring the deficient reading to the attention of the Plant Operator. Additional personnel errors were made by the Plant Operator and a licensed Shift Supervisor when they failed to note the deficient voltage reading during subsequent reviews of the inside rounds data package. The 2B charger was not declared inoperable until 7/13/92 when the deficient voltage reading was properly noted and reported to Main Control Room Operations personnel during performance of procedure 34GO-OPS-030-2S.

ENCLOSURE 1 (Continued)

VIOLATION 92-18-04 AND GPC RESPONSE

The deficient voltage output from the 2B charger was the result of component failure. Circuit boards in the charger failed resulting in a low voltage output and no current output from the charger.

A contributing cause to the approximately 26 hour delay in identifying the 2B charger as inoperable was an error in plant procedure 34G0-OPS-030-2S. Specifically, the acceptance criterion for the charger output amperage was incorrect. The error led the Plant Equipment Operator to incorrectly conclude that a zero amperage charger output reading was acceptable and that the charger was operable.

When the 2B charger was declared inoperable on 7/13/92, the 2C Station Service Battery Charger was placed into service. However its 600V AC feeder breaker tripped and, subsequent to its reset, fuses internal to the 2C charger blew, rendering the charger inoperable. This was the result of component failure. The charger rectifier bank was imbalanced causing excessive current in the rectifier firing circuits and in the AC supply to the charger.

The 2C charger was repaired and returned to service on 7/13/92 without performing an adequate functional test due to errors by personnel assigning the functional test to the Maintenance Work Order for the charger. Specifically, the involved personnel failed to realize the need for special technical expertise in determining the functional test for the work performed on the charger. Consequently, they did not obtain the necessary engineering input and assigned a less than adequate functional test resulting in the charger incorrectly being returned to an operable status. The inadequate functional test failed to detect additional problems with the charger which, in fact, made it inoperable.

The above problems resulted in less than two operable, in service, Division I Station Service Battery Chargers for a period of at least 18 hours during the period from 7/12/92 to 7/16/92 without the appropriate actions being taken as required by Unit 2 Technical Specifications section 3.8.2.3.

Corrective steps which have been taken and the results achieved:

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

1. A proper functional test was performed on the 2C charger on 7/19/92. Additional problems detected during the performance of the functional test were corrected and the charger was declared operable on 7/19/92.
2. The responsible Plant Equipment Operator was subjected to formal disciplinary action under GPC's Positive Discipline Program.

ENCLOSURE 1 (Continued)

VIOLATION 92-18-04 AND GPC RESPONSE

3. The responsible Plant Operator and Shift Supervisor were counseled regarding their failure to note the deficient voltage reading during their reviews of the data package from procedure 34G0-OPS-030-2S.
4. Each operating team received training on this event with emphasis on the importance of accurate rounds data collection, comparison to limits, and data review.
5. Operations management discussed the importance of accurate data collection with each operating team.
6. The Operations Department manager sent a letter to Operations personnel giving management expectations for plant data collection and review.
7. The need to maintain a questioning attitude and to seek technical assistance when necessary has been communicated in writing to personnel responsible for functional test assignment.
8. The functional test assignment matrix has been revised to specifically address tests for battery chargers.
9. Procedure 34G0-OPS-030-2S was revised on 9/7/92 to correct the charger output current acceptance criterion and to require more frequent checks of the Station Service Battery Chargers.
10. The low voltage alarm setpoint has been raised on all station service and diesel generator battery sets.
11. The Unit 2 Station Service Battery Chargers are being replaced during the current Unit 2 Refueling Outage. The Unit 1 Station Service Battery Chargers have already been replaced.

Corrective steps which will be taken to prevent further violations:

No additional corrective actions are necessary at this time to prevent further violations.

Date when full compliance will be achieved:

Full compliance was achieved on 7/16/92 at 1825 CDT when the 2B charger was returned to service following successful completion of a load test. At this time, two Division 1 Station Service Battery Chargers were operable and in service as required by the Unit 2 Technical Specifications.

ENCLOSURE 2

PLANT HATCH - UNIT 2
NRC DOCKET 50-366
OPERATING LICENSE NPF-5
VIOLATION 92-18-05 AND GPC RESPONSE

VIOLATION 92-18-05

Technical Specification (TS) 6.7.1a requires that written procedures be established, implemented, and maintained covering activities delineated in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978.

RG 1.33, Appendix A, "Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors," paragraph 1h provides, in part, that the licensee establish and follow written administrative procedures for log entries, record retention and review procedures.

Procedure 34GO-OPS-030-1S, Duty Inside Rounds, step 7.1.19 requires that any check or inspection which is not within limits must be reported to the Plant Operator when discovered and circled in red ink by the Plant Equipment Operator discovering the condition.

Contrary to the above, on July 12, 1992, an out of limits voltage indication on the 2B station service battery charger was not reported to the Plant Operator nor circled in red ink by the Plant Equipment Operator.

This is a Severity Level IV violation. (Supplement 1)

RESPONSE TO VIOLATION 92-18-05

Admission or denial of the violation:

The violation occurred as described in the Notice of Violation, except that the procedural requirements that were not followed were in 34GO-OPS-030-2S, "Daily Inside Rounds."

Reason for the violation:

The violation was caused by personnel error. The Plant Equipment Operator performing procedure 34GO-OPS-030-2S on 7/12/92 failed to identify that the output voltage of the 2B Station Service Battery Charger was out of procedural specification. He recorded the charger output voltage but did not notice the reading was outside the limits given in the procedure. Consequently, he failed to bring the deficient reading to the attention of the Plant Operator and circle it in red as required by procedure 34GO-OPS-030-2S. Additional personnel errors were made by the Plant Operator and a licensed Shift Supervisor when they failed to note the deficient voltage reading during subsequent reviews of the inside rounds data package.

ENCLOSURE 2 (Continued)

VIOLATION 92-18-05 AND GPC RESPONSE

Corrective steps which have been taken and the results achieved:

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

1. The responsible Plant Equipment Operator was subject to formal disciplinary action under GPC's Positive Discipline Program.
2. The responsible Plant Operator and Shift Supervisor were counseled regarding their failure to note the deficient voltage reading during their reviews of the data package.
3. Each operating team received training on this event with emphasis on the importance of accurate rounds data collection, comparison to limits, and data review.
4. Operations management discussed the importance of accurate data collection with each operating team.
5. The Operations Department manager sent a letter to Operations personnel giving management expectations for plant data collection and review.

Corrective steps which will be taken to prevent further violations:

No additional corrective actions are necessary at this time to prevent further violations.

Date when full compliance will be achieved:

Full compliance was achieved on 7/13/92 when the deficient voltage condition for the 2B Station Service Battery Charger was discovered during a subsequent performance of procedure 34G0-OPS-030-2S and reported to the Plant Operator as required.