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J. T. Beckham, Jr.
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August 6, 1996

Docket No. 50-321
50-366

HL-5216

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

Edwin I. Hatch Nuclear Plant
Reply to a Notice of Violation

Gentlemen:

In response to your letter dated July 19, 1996, and according to 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 96-07. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Sincerely,

J. T. Beckham, Jr.

JKB/jp

Enclosure: Violation 96-07-02 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. Ebnetter, Regional Administrator
Mr. B. L. Holbrook, Senior Resident Inspector - Hatch

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Enclosure

Edwin I. Hatch Nuclear Plant
Violation 96-07-02 and GPC Response

VIOLATION 96-07-02

10 CFR 50, Appendix B, Criterion V states in part that, activities affecting quality shall be prescribed by documented instructions, procedures or drawings. Criterion V also states, in part, that those instructions, procedures or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Procedure 50AC-MNT-001-0S: Maintenance Program, Revision 24, step 4.5.12.8, required that post maintenance functional testing be identified and assigned. Section 8.6 required in part that, maintenance/central scheduling will assign functional test requirements necessary to assure a suitable level of confidence in structures, systems or components and that functional tests are performed at the completion of work to ensure that the component worked on is capable of performing its intended function.

Contrary to the above, between May 9 and 21, 1996, maintenance and engineering work instructions used for work activities affecting quality did not include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished, in that, a total of 295 instantaneous trip setpoints on circuits were reviewed and the setpoints on 72 of these were decreased without the issuance of either a design change document and/or a post modification/maintenance test specified.

As a result, Residual Heat Removal valve 2E11F024B, Full Flow Test/Torus Cooling, tripped during normal plant activities on May 21, 1996, following a decrease in the trip setpoint on May 14, 1996.

This is a Severity Level IV Violation (Supplement I).

RESPONSE TO VIOLATION 96-07-02

Reason for the violation:

Residual Heat Removal system motor-operated valve 2E11-F024B failed to operate on 5/21/96 when the molded case circuit breaker feeding the motor tripped as Operations personnel attempted to open the valve. The circuit breaker tripped because the instantaneous trip setpoint was too low and the valve had not been operated since

changing the breaker setpoint. The trip setpoint had been reduced on 5/14/96 as part of actions taken to verify the setpoints for safety related molded case circuit breakers. However, Architect/Engineer personnel used an inaccurate value for the motor locked rotor amps resulting in an incorrect trip setpoint being calculated. Equipment was not cycled after breaker setpoint changes were made due to personnel incorrectly concluding that verifying the setpoint represented adequate post maintenance acceptance criteria. This conclusion was made as conservatisms used in determining breaker setpoints were assumed to be sufficient to preclude impacting the ability of equipment to operate on demand.

Corrective steps which have been taken and the results achieved:

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

1. The breaker trip setpoint for valve 2E11-F024B was returned to the original, higher value. Unit 1 Residual Heat Removal system valves 1E11-F024A and B and Unit 2 Residual Heat Removal system valve 2E11-F024A were stroked successfully at the reduced motor breaker trip setpoints. Their motor breaker trip setpoints then were raised to new values recalculated by the Architect/Engineer.
2. Where possible, equipment with lowered motor breaker trip setpoints was tested to ensure operation at the reduced setpoints. To date, over 150 pieces of equipment have been cycled with no failures noted. Consequently, the only failure caused by an inadequate setpoint change is the example cited in the Notice of Violation.
3. The lowered breaker trip setpoints for those valves which could not be stroked due to plant conditions were returned to their original, higher values. Architect/Engineer personnel determined that the minimum credible fault current would trip the breakers at their higher settings and that the breakers would clear the fault in sufficient time to prevent cable damage. Therefore, it was concluded that the higher trip setpoints for these breakers were acceptable. These setpoints will be reduced when plant conditions allow the equipment to be cycled to verify proper operation at the lower breaker trip values.
4. Personnel responsible for the error in the Architect/Engineer calculation and for the assignment of the inappropriate functional test have been made aware of their errors and the consequences of those errors. In addition, the design process for determining breaker trip setpoints has been reviewed and changes made as deemed appropriate.

Corrective steps which will be taken to avoid further violations:

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

Enclosure

Violation 96-07-02 and GPC Response

Date when full compliance will be achieved:

Where possible, equipment with reduced breaker trip setpoints has been tested to ensure proper operation. No further problems were experienced. For equipment which could not be tested, the breaker trip setpoints were returned to the original setting. Therefore, Plant Hatch presently is in compliance with requirements for post-maintenance or modification functional testing.