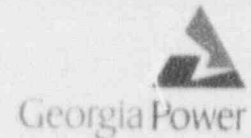


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J. T. Beckham, Jr.  
Vice President - Nuclear  
Hatch Project



*the southern electric system*

HL-3019  
004271

November 11, 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  
LICENSEE EVENT REPORT  
PRIMARY CONTAINMENT PENETRATIONS  
FOUND WITH NON-CODE SEALING DEVICES

Gentlemen:

Georgia Power Company is submitting the enclosed voluntary Licensee Event Report (LER) as a follow-up to LER 50-366/1991-018. The report concerns several spare primary containment penetrations found with non-code sealing devices.

Sincerely,

J. T. Beckham, Jr.

OCV/cr

Enclosure: LER 50-366/1992-020

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. Ebnetter, Regional Administrator  
Mr. L. D. Wert, Senior Resident Inspector - Hatch

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## LICENSEE EVENT REPORT (LER)

|   |        |  |                |                 |                  |                 |        |                      |                               |  |                                   |                    |     |      |
|---|--------|--|----------------|-----------------|------------------|-----------------|--------|----------------------|-------------------------------|--|-----------------------------------|--------------------|-----|------|
| FACILITY NAME (1)<br>PLANT HATCH, UNIT 2  |        |  |                |                 |                  |                 |        |                      |                               | DOCKET NUMBER (2)<br>05000366          |                                   | PAGE (3)<br>1 of 5 |     |      |
| TITLE (4)<br>SPARE PRIMARY CONTAINMENT PENETRATION SEALING DEVICES DO NOT MEET ASME CODE REQUIREMENTS |        |  |                |                 |                  |                 |        |                      |                               |  |                                   |                    |     |      |
| EVENT DATE (5)  |        |  | LER NUMBER (6) |                 |                  | REPORT DATE (7) |        |                      | OTHER FACILITIES INVOLVED (8) |  |                                   |                    |     |      |
| MONTH   | DAY    | YEAR   | YEAR           | SEQ NUM         | REV              | MONTH           | DAY    | YEAR                 | FACILITY NAMES                |  | DOCKET NUMBER(S)                  |                    |     |      |
| 10  | 10     | 92   | 92             | 020             | 00               | 11              | 11     | 92                   |                               |  | 05000                             |                    |     |      |
| OPERATING MODE (9)  |        | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR (11) |                |                 |                  |                 |        |                      |                               |  |                                   |                    |     |      |
| N   |        | 20.402(b)  |                |                 | 20.405(c)        |                 |        | 50.73(a)(2)(iv)      |                               |  | 73.71(b)                          |                    |     |      |
| POWER LEVEL   |        | 000  |                |                 | 20.405(a)(1)(i)  |                 |        | 50.36(c)(1)          |                               |  | 73.71(c)                          |                    |     |      |
|   |        | 20.05(a)(1)(ii)  |                |                 | 50.3F(c)(2)      |                 |        | 50.73(a)(2)(vii)     |                               |  | OTHER (Specify in Abstract below) |                    |     |      |
|   |        | 20.405(a)(1)(iii)  |                |                 | 50.73(a)(2)(i)   |                 |        | 50.73(a)(2)(viii)(A) |                               |  | VOLUNTARY                         |                    |     |      |
|   |        | 20.405(a)(1)(iv)   |                |                 | 50.73(a)(2)(ii)  |                 |        | 50.73(a)(2)(viii)(B) |                               |  |                                   |                    |     |      |
|   |        | 20.405(a)(1)(v)  |                |                 | 50.73(a)(2)(iii) |                 |        | 50.73(a)(2)(x)       |                               |  |                                   |                    |     |      |
| LICENSEE CONTACT FOR THIS LER (12)  |        |  |                |                 |                  |                 |        |                      |                               |  |                                   |                    |     |      |
| NAME  |        |  |                |                 |                  |                 |        |                      |                               | TELEPHONE NUMBER                       |                                   |                    |     |      |
| STEVEN B. TIPPS, MANAGER NUCLEAR SAFETY AND COMPLIANCE, HATCH   |        |  |                |                 |                  |                 |        |                      |                               | AREA CODE                              |                                   | 367-7851           |     |      |
| 712   |        |  |                |                 |                  |                 |        |                      |                               |  |                                   |                    |     |      |
| COMPLETE ONE LINE FOR EACH FAILURE DESCRIBED IN THIS REPORT (13)                                      |        |  |                |                 |                  |                 |        |                      |                               |  |                                   |                    |     |      |
| CAUSE   | SYSTEM | COMPONENT  | MANUFACTURER   | REPORT TO NPRDS |                  | CAUSE           | SYSTEM | COMPONENT            | MANUFACTURER                  | REPORT TO NPRDS                        |                                   |                    |     |      |
|   |        |  |                |                 |                  |                 |        |                      |                               |  |                                   |                    |     |      |
|   |        |  |                |                 |                  |                 |        |                      |                               |  |                                   |                    |     |      |
| SUPPLEMENTAL REPORT EXPECTED (14)   |        |  |                |                 |                  |                 |        |                      |                               | EXPECTED SUBMISSION DATE (15)          |                                   | MONTH              | DAY | YEAR |
| <input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)                              |        |  |                |                 |                  |                 |        |                      |                               | <input checked="" type="checkbox"/> NO |                                   |                    |     |      |
| ABSTRACT (16)   |        |  |                |                 |                  |                 |        |                      |                               |  |                                   |                    |     |      |

On 10/10/92 at 1200 CDT, Unit 2 was in its tenth refueling outage with the core unloaded. At that time, it was determined that the sealing devices for 22 spare Unit 2 Primary Containment penetrations did not meet the requirements of the Code of the American Society of Mechanical Engineers (ASME). Specifically, it was determined that the sealing devices for the aforementioned spare penetrations were not constructed from material required by the ASME Code, Section III, Subsection NE, "Metal Containments," nor were the welds which attached the sealing devices to the penetrations made or inspected per applicable ASME Code requirements.

The cause of this event was construction error. The subject sealing devices were installed during unit construction, prior to the initial Primary Containment pressurization acceptance test. They were intended to be temporary sealing devices that were to be replaced with permanent sealing devices following the initial acceptance test. However, due to an oversight, 22 temporary sealing devices were not replaced with permanent sealing devices meeting ASME Code requirements.

Corrective actions for this event include walking down the spare Unit 2 Primary Containment penetrations, replacing the non-Code scaling devices with ones that meet applicable ASME Code requirements, and walking down the spare Unit 1 Primary Containment penetrations. An Integrated Leak Rate Test will be performed on Unit 2 prior to startup from the Fall 1992 refueling outage.

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PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor

Energy Industry Identification System codes are identified in the text as (EIIIS Code XX).

DESCRIPTION OF EVENT

On 10/10/92 at 1200 CDT, Unit 2 was in its tenth refueling outage with the core unloaded. At that time, it was determined that the sealing devices (EIIIS Code JC) for 22 spare Unit 2 Primary Containment penetrations did not meet the requirements of the Code of the American Society of Mechanical Engineers (ASME). Specifically, it was determined that the sealing devices for the aforementioned spare penetrations were not constructed from material required by the Code, Section III, Subsection NE, "Metal Containments," nor were the welds which attached the sealing devices to the penetrations made or inspected per applicable ASME Code requirements.

Earlier in the refueling outage, which began on 9/16/92, a site Engineer instructed contract technicians on how to perform the Unit 2 Primary Containment penetration walkdown to which Georgia Power Company had committed in Licensee Event Report (LER) 50-366/1991-018. In that LER, Georgia Power Company committed to walkdown the Unit 1 and Unit 2 Primary Containment penetrations in order to verify that the penetration sealing devices were being properly tested per applicable Technical Specifications surveillance requirements. While pointing out typical penetrations and penetration sealing devices to the contract technicians, the Engineer noted an unusually shaped sealing device on a spare Unit 2 penetration. The sealing device was a square piece of metal welded to the end of the penetration; normal sealing devices for spare penetrations are round caps.

The Engineer reviewed site drawings to determine if the unusually shaped sealing device was reflected on a drawing. He found that it was shown on a plant drawing as a temporary sealing device. Further, the drawing indicated the temporary sealing device, identified as a "test cap," was to have been removed. These efforts went beyond the original commitment in the LER.

A walkdown of the 79 Unit 2 Primary Containment penetrations identified as spares was then performed. A total of 22 of these penetrations were found with temporary sealing devices. A deficiency Card was written on 10/10/92 documenting the results of the walkdown.

Additional research determined that the temporary sealing devices did not meet ASME Code requirements. They were not constructed from ASME Code required material nor were the welds which attached the sealing devices to the penetrations made or inspected per ASME Code requirements. The ASME Code,

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Section III, Subsection NE, requires the sealing devices to be constructed from an "SA" grade metal; however, it was found the 22 temporary sealing devices were constructed from an "A" grade metal, a lower grade than "SA." Additionally, it appears the welds were not made as required by the ASME Code nor were they inspected using Code required Non-Destructive Examination (NDE) techniques. It should be noted that these sealing devices were being tested as required by, and met all applicable operability requirements of, the Unit 2 Technical Specifications.

CAUSE OF EVENT

The cause of this event was construction error. The 22 temporary sealing devices were installed during unit construction, prior to the initial Primary Containment pressurization acceptance test. They were intended to be temporary sealing devices that were to be removed and replaced with permanent sealing devices following the initial acceptance test. They were installed to provide a temporary boundary so the Primary Containment could be pressure tested; consequently, neither their material nor their welds met applicable ASME Code requirements. However, due to an oversight, 22 temporary sealing devices were not removed and replaced with permanent sealing devices meeting ASME Code requirements following completion of the initial acceptance test.

REPORTABILITY ANALYSIS AND SAFETY ASSESSMENT

This report is being submitted voluntarily as a follow-up to Hatch's corrective actions for LER 50-366/1991-018. In that LER, Georgia Power Company committed to walkdown the Unit 1 and Unit 2 Primary Containment penetrations in order to verify that the penetration sealing devices were being properly tested per applicable Technical Specifications surveillance requirements. Although not required to meet the commitment, a site Engineer reviewed plant drawings when he noted an unusually shaped sealing device on a spare Unit 2 penetration. This led to the discovery that 22 sealing devices did not meet ASME Code requirements for material and welds. It should be noted that these sealing devices were being tested as required by, and met all applicable operability requirements of, the Unit 2 Technical Specifications.

The purposes of the Unit 2 Primary Containment and its penetration sealing devices are to contain any radioactive material which might be released during and following an accident and to limit leakage paths and associated leakage rates to those assumed in the accident analyses. This ensures the site boundary radiation doses are within the limits of 10 CFR 100 during accident conditions. Sealing devices, including automatic valves, blind flanges, and welded caps, are used to isolate the Primary Containment atmosphere from the outside environment. Leakage rates through Primary Containment penetrations and of the Primary Containment as a whole are measured periodically to ensure they are consistent with the leakage rates assumed in the accident analyses.

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In this event, it was discovered that the sealing devices for 22 spare Unit 2 Primary Containment penetrations did not meet applicable ASME Code requirements. However, the containment's ability to contain radioactive material and limit its leakage rate to or below that assumed in the accident analyses was not adversely affected by the use of non-Code sealing devices. The Primary Containment successfully passed its initial pressurization test, performed at 1.25 times its design pressure of 56 psig, with the non-Code sealing devices in place. Successful containment integrated leakage rate tests have been performed periodically subsequent to the initial pressurization test. These tests proved that the containment leakage rate was within allowable limits and, therefore, that the non-Code sealing devices were functioning properly to limit leakage through the associated spare penetrations.

Based on the above discussion, it is concluded that this event had no adverse effect on nuclear safety or the health and safety of the public.

CORRECTIVE ACTION

The Unit 2 penetrations identified as spares in the Hatch Primary Containment review report were walked down to identify those with non-Code sealing devices. A total of 22 were found.

The non-Code sealing devices have been replaced with ones that meet applicable ASME Code requirements.

The accessible spare Unit 1 Primary Containment penetrations as identified from a list compiled from a previous walkdown performed per commitments made in Licensee Event Report 50-366/1991-018 were walked down. Potential problems with 16 of the spare penetrations were found. Specifically, 13 of the as-found penetration sealing devices did not match the sealing devices shown on the drawings. Additionally, the drawings for three sealing devices indicated they were made of non-Code material. However, because of the location of these 16 sealing devices (scaffolding near scram sensitive instruments will be required to get close to them), personnel could not determine if the actual sealing devices met ASME Code requirements.

The inaccessible spare Unit 1 Primary Containment penetrations will be walked down during the next Unit 1 outage of sufficient duration but no later than the refueling outage scheduled to begin in March 1993. Also, it will be determined during this outage if the 16 spare penetrations mentioned previously have ASME Code required sealing devices. Any non-Code sealing devices found will be replaced with sealing devices meeting ASME Code requirements prior to Unit 1 startup from the refueling outage.



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TEXT

ADDITIONAL INFORMATION

No systems other than those mentioned in this report were affected by this event.

No failed components caused or resulted from this event.

No previous similar events in which non-Code required material or components were found have been reported in the last two years.