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J. T. Beckham, Jr.  
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May 21, 1996

Docket Nos. 50-321  
50-366

HL-5175

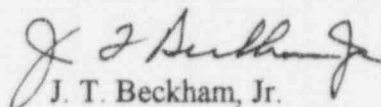
U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

Edwin I. Hatch Nuclear Plant - Units 1 and 2  
Reply to a Notice of Violation

Gentlemen:

In response to your letter dated April 25, 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 96-04. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Sincerely,



J. T. Beckham, Jr.

JKB/ld

Enclosures:

1. Violation 96-04-01 and GPC Response
2. Violation 96-04-02 and GPC Response
3. Violation 96-04-03 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. Ebner, Regional Administrator  
Mr. B. L. Holbrook, Senior Resident Inspector - Hatch

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Enclosure 1

Edwin I. Hatch Nuclear Plant  
Violation 96-04-01 and GPC Response

VIOLATION 96-04-01

Unit 1 Technical Specifications 3.6.4.1.1 and 3.6.4.1.2, requires (sic) surveillance procedures to verify, in part, that all secondary containment equipment hatches be closed and sealed and access doors closed except when used for entry or exit and then at least one door shall be closed. The surveillance procedures were required to be completed at least once every 31 days. The required frequency is permitted to be extended 25 percent of the surveillance interval.

Contrary to the above, surveillance procedure 34SV-T22-002-0S: Secondary Containment Integrity Demonstration, Revision 1, to verify the above conditions was performed on January 2, 1996, but not performed again until February 23, 1996. This exceeded the extended grace period which expired on February 5, 1996.

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

RESPONSE TO VIOLATION 96-04-01

Reason for the violation:

This violation was caused by personnel error. A licensed shift support supervisor incorrectly determined that the surveillance procedure required was 34SV-T22-001-OS, "Secondary Containment Test". The correct procedure was 34SV-T22-002-OS, "Secondary Containment Integrity Demonstration". The Shift Support Supervisor reviewed the surveillance task sheet for the secondary containment integrity demonstration and mistakenly associated the demonstration for the secondary containment test. Since proper performance of the secondary containment test requires wind speed to be less than five miles per hour, he then determined that wind speed was greater than five miles per hour and deferred the surveillance based upon the excessive wind speed. This error was not discovered until February 23, 1996, when licensed Operations personnel reviewed the deferred surveillances and discovered the secondary containment integrity demonstration had not been performed as required.

Enclosure 1  
Violation 96-04-01 and GPC Response

Corrective steps which have been taken and the results achieved:

The secondary containment integrity demonstration surveillance was performed successfully on February 23, 1996, upon discovery of the error. The involved individual was placed in GPC's Positive Discipline Program.

Corrective steps which will be taken to avoid further violations:

No additional corrective actions are necessary to prevent further violations.

Date when full compliance will be achieved:

Full compliance was achieved on February 23, 1996, when the secondary containment integrity demonstration was performed satisfactorily per Unit 1 Technical Specifications surveillance requirements 3.6.4.1.1 and 3.6.4.1.2.

## Enclosure 2

### Edwin I. Hatch Nuclear Plant Violation 96-04-02 and GPC Response

#### VIOLATION 96-04-02

Hatch Technical Specification 5.4 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 1.d, recommends written procedures for procedural adherence. Paragraph 2.g, recommends procedures for power operations and process monitoring.

Procedure 34GO-OPS-005-2S: Power Changes, Revision 18, step 5.2.2 states in part, that all normal power operation shall be within the "region of operation" defined on the Power Versus Flow Map of Attachment 1.

Procedure 51GM-MNT-002-0S: Maintenance Housekeeping and Tool Control, Revision 11, Step 5.2.6 indicates, in part, that clear plastic shall not be carried onto the refueling floor unless there is no practical alternative material available.

Contrary to the above, written procedures were not implemented in that:

1. On February 29, 1996, Unit 2 was operated for about four hours outside the region of operation as defined in Attachment 1, Power Versus Flow Map, per Procedure 34GO-OPS-005-2S.
2. On March 21 and March 26, 1996, during performance of Procedure 51GM-MNT-002-0S: Maintenance Housekeeping and Tool Control, Revision 11, Step 5.2.6 was not completed as required. Although a practical alternative material was available, clear plastic was found on the refueling floor.

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

RESPONSE TO VIOLATION 96-04-02

Reason for the violation:

Example 1 of the violation was caused by personnel error. Operations personnel did not realize they were in the operation not allowed region of the Power Versus Flow Map when they received the Average Power Range Monitor (APRM) upscale alarms. They also did not periodically check as power was increased to ensure operation was maintained within the acceptable region of the map.

A contributing factor may have been a recent change to the APRM upscale alarm setpoint. The setpoint was increased three percent, placing it closer to the region of the Power Versus Flow Map where operation is not allowed. Prior to this change, operating practice had been to increase power until receipt of the APRM upscale alarm; this practice was acceptable since the APRM upscale alarm setpoint was below the operation not allowed region. Therefore, Operations personnel expected to receive the APRM upscale alarm during power increases and still be within the allowed region of the Power Versus Flow Map. This expectation may have contributed to their failure to realize they were in the operation not allowed region of the power versus flow map.

Example 2 of the violation was caused by personnel error. Personnel inappropriately transported or controlled clear plastic on the refueling floor in violation of procedural requirements, management expectations, and a sign posted on the door to the refueling floor.

Contributing to the March 21, 1996, event may have been conflicting procedural requirements concerning the use and control of clear plastic received on the refueling floor. Procedures 51GM-MNT-002-0S, "Maintenance Housekeeping and Tool Control," and 10AC-MGR-021-0S, "Foreign Material Exclusion," did not provide consistent requirements in that the first procedure did not require timely removal of clear plastic while the latter procedure required removal as soon as practical. Step 5.2.5 of procedure 51GM-MNT-002-0S allowed clear plastic on the refueling floor if the clear plastic was securely fastened or identified with a colored item. However, the procedure did not provide instructions to remove the clear plastic as soon as practically possible. Procedure 51GM-MNT-002-0S was temporarily changed on March 23, 1996, to require removal as soon as practical. The March 26, 1996, event represented a misuse of clear plastic material caused by personnel error.

Corrective steps which have been taken and the results achieved:

For Example 1, the involved personnel were counseled regarding their inappropriate actions. Additionally, Beginning of Shift Training was given to Operations personnel regarding this event, its causes, and its consequences.

Enclosure 2

Violation 96-04-02 and GPC Response

For Example 2, the involved personnel no longer work at Plant Hatch, therefore, counseling was not appropriate. Additionally, procedure 51GM-MNT-002-0S was revised to be consistent with the requirements of procedure 10AC-MGR-021-0S to provide clear and consistent procedural requirements to adequately control clear items received on the refueling floor.

Corrective steps which will be taken to avoid further violations:

No additional corrective actions are necessary to prevent further violations.

Date when full compliance will be achieved:

Full compliance was achieved on March 26, 1996, when the clear plastic was removed from the refueling floor.



Enclosure 3

Edwin I. Hatch Nuclear Plant  
Violation 96-04-03 and GPC Response

VIOLATION 96-04-03

Hatch Unit 1 Technical Specifications 5.4, require (sic) that written procedures be established, implemented and maintained covering activities delineated in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978.

RE 1.33, Appendix A, "Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors", Paragraph 6.p, recommends written procedures for Fire in Control Room or Forced Evacuation of Control Room. Implicit in these requirements is that the procedures are adequate.

Contrary to the above, there was inadequate procedural guidance for operation of the Reactor Core Isolation Cooling system from the Remote Shutdown Panel for a forced evacuation of the control room. As of April 4, 1996, and from at least December 1990, Plant procedure 31RS-OPS-001-1S: Shutdown From Outside Control Room, did not contain instructions to place the normal - emergency switch 1C82-S27, for valve 1E51-F119 (steam to turbine bypass valve), to the emergency position. As a result, the steam supply valves would not open and the Reactor Core Isolation Cooling system could not be started from the remote shutdown panel as required by procedure.

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

RESPONSE TO VIOLATION 96-04-02

Reason for the violation:

The reason for the violation was personnel error. Plant Modification and Maintenance Support personnel and Operations personnel responsible for identifying procedures affected by the design change installing valve 1E51-F119 failed to identify procedure 31RS-OPS-001-1S as requiring revision.

It should be noted that Remote Shutdown Panel switch 1C82-S27 was not installed and connected until May 1993. Therefore, procedure 31RS-OPS-001-1S contained inadequate guidance since May 1993 when switch 1C82-S27 was installed and made operational.

Enclosure 3

Violation 96-04-03 and GPC Response

Corrective steps which have been taken and the results achieved:

The revision history for procedure 31RS-OPS-001-1S was reviewed. It was found that the procedure has been revised three times since 1994 as a result of the implementation of different design changes. It was concluded the error represented an isolated event and that Remote Shutdown Panel operating procedures are routinely reviewed for impact from design change work.

Because the error occurred three years ago, counseling responsible personnel still employed at Plant Hatch was not considered appropriate.

Corrective steps which will be taken to avoid further violations:

No additional corrective actions are necessary to prevent further violations.

Date when full compliance will be achieved:

Full compliance was achieved in April 1996 when valve 1E51-F119 was removed from the plant per Design Change Request 94-033. Procedure 31RS-OPS-001-1S correctly contains adequate instructions to operate the Reactor Core Isolation Cooling system from the Remote Shutdown Panel.