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Georgia Power
the southern electric system

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NED 85-456
1777N

June 17, 1985

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

REFERENCE:
RII: JNG
50-321/50-366
I&E 85-10

ATTENTION: Dr. J. Nelson Grace

Gentlemen:

Pursuant to 10 CFR 2.201, Georgia Power Company (GPC) submits the following information regarding the apparent violations cited by the NRC Senior Resident Inspector at Plant Hatch during an inspection period from March 23 to April 27, 1985.

VIOLATION 1:

Technical Specification 6.8.1.c of Units 1 and 2 requires that written procedures shall be established, implemented, and maintained for surveillance and test activities of safety related equipment.

Contrary to the above, the following failures to implement "Battery Pilot Cell Surveillance", HNP-1-3751-M for Unit 1 and HNP-2-3751 for Unit 2, were identified during the periods of September 5 - December 6, 1984, for Unit 1 and of January 4 - March 28, 1984, for Unit 2:

a. The 125 VDC Diesel Generator Batteries and 125/250 VDC Station Service Batteries for Units 1 and 2, which are respectively addressed in Technical Specification 4.8.1.1.3 and 4.8.2.3.2, did not use the actually determined pilot cell voltage in twenty-one instances.

b. Mathematical errors on January 12 and 18, 1984, resulted in the determination of several wrong corrected specific gravities for class 1E Unit 2 batteries.

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c. Indication that the Shift Supervisor was notified of the surveillance completion was omitted on October 31, November 11, and December 12, 1984, for Unit 1; and on January 12 and 31, February 29, and March 6, 1984, for Unit 2.

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

Response to Violation 1:

Admission or denial of alleged violation: The violation occurred.

Reason for Violation 1: The above cited failures to properly implement the weekly Battery Pilot Cell Surveillance, HNP-1/2-3751-M, resulted from personnel errors. Personnel did not clearly understand the requirements prior to the performance of the procedure, and supervisory personnel did not perform an adequate review of the procedure data pages.

Corrective steps which have been taken and the results achieved:

On May 1, 1985, when the appropriate personnel were notified of the discrepancies, a supervisory review chain was established to thoroughly examine procedure data results including a quality control check for mathematical errors. This review concluded that the battery was operable and capable of performing its intended function. Personnel involved with the violation and personnel presently working these surveillances participated in a seminar to critique and discuss procedural violations. Instruction was provided by supervisory personnel to ensure future compliance with HNP-1/2-3751.

Corrective steps which will be taken to avoid further violations: Procedure HNP-1/2-3751 will be revised as an added measure to ensure future compliance. Signoff steps will be included to indicate that persons performing surveillances have established appropriate pilot cells and that appropriate supervisory personnel and the system engineer have reviewed the procedure data for accuracy and completeness. The procedures will be revised by September 13, 1985.

Date when full compliance was achieved: Full compliance was achieved on May 1, 1985.

Violation 2:

Technical Specification 6.8.1 requires that procedures shall be established, implemented and maintained covering safety-related activities.

Contrary to the above, procedure HNP-1-1670, Diesel Generator Standby Operating Instructions, was not properly implemented in that on February 12, 1985, two valves were found out of the position required by Data Package 2 of HNP-1-1670. The lube oil filter drain valve (R43-F3012A) (sic, R43-F3012B) and the lube oil strainer drain valve (R43-F3013A) (sic, R43-F3014C) were required to be shut and were found open. Data Package 2 requires independent verification for the valve line up.

This is a Severity Level IV violation (Supplement I) and is applicable to Unit 1 only.

Response to Violation 2:

Admission or denial of alleged violation: The violation occurred, but not exactly as stated.

Reason for Violation 2: The valve mispositioning occurred because of personnel errors. Proper documentation of Data Package 2 of HNP-1-1670, and personnel interviews indicate that the procedure was properly implemented on February 5, 1985. Subsequent investigation revealed that several activities occurred between the time that the valve lineup was performed and the the time of the discovery of the valve discrepancies. Among these subsequent activities were: the cleaning and painting of various diesel components, maintenance of the lube oil filter and heaters, performance of clearances to re-lug jacket coolant and lube oil heater breaker terminals, and heating of lube oil. None of the activities required manipulation of the cited valves. Therefore, the exact cause of the valve position errors could not be positively determined. It was concluded that the valves in question were probably mispositioned during the maintenance activities.

Corrective steps which have been taken and the results achieved: The valves were correctly repositioned on February 13, 1985. A system walkdown was performed for the purpose of identifying valve labeling and

ensuring existing prints matched the configurations of the diesels. A standing order was written to require Data Package 2 of procedures HNP-1/2-1670 to be performed under any of the following circumstances: 1) once per week day for one of the five diesel generators such that all are checked at least once per week, 2) following any maintenance work order activity on the affected diesel generator, and 3) following restoration of any equipment clearance on the affected diesel generator.

Corrective steps which will be taken to avoid further violations: The standing order noted above will be active for not less than six months and discontinued upon determination of an acceptable history of valve position verifications. A list of valves critical to the proper operation of the diesels will be added to procedure HNP-1-1061, Daily Outside Rounds. The revised procedure will ensure that the valves are checked on a frequent basis. The procedure will be revised by September 13, 1985. In addition, appropriate departmental training will be given to explain the facts related to this event and clearly delineate the location and proper positioning of the subject valves. Training will be completed by June 21, 1985.

Date when full compliance was achieved: Full compliance was achieved on February 13, 1985.

If you have any questions regarding this submittal, please contact this office.

Yours very truly,

L. T. Gucwa

CS/mb

xc: J. T. Beckham, Jr.
H. C. Nix, Jr.
J. N. Grace (NRC- Region II)
Senior Resident Inspector