NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/85

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
EDWIN I. HATCH, UNIT 2	0 5 0 0 0 3 6 6	1 OF 0 7

TITLE (4)

FAILURE TO MEET TECH. SPECS. ACCEPTANCE CRITERIA

EVENT DATE (5)			LER NUMBER (6)					REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR		SEQUENTIAL NUMBER		REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
0 3	1 3	8 5	8 4	—	0 3 0	—	0 3	0 7	0 1	8 5	Edwin I. Hatch, Unit	0 5 0 0 0 3 2 1
												0 5 0 0 0

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
POWER LEVEL (10)	0 9 9	20.402(b)	20.406(c)	50.73(a)(2)(iv)	73.71(b)
		20.406(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
		20.406(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
		20.406(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
		20.406(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
		20.406(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
	AREA CODE
Steven B. Tipps, Superintendent of Regulatory Compliance	9 1 2 3 6 7 - 7 8 5 1

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On 11/15/84 (the first event), the plant's surveillance coordinator determined that the monthly channel functional test had not been performed on the main steam line instrumentation for the months of September and October. This monthly test is required by Tech. Specs. table 4.3.2-1, item D., as well as the "MAIN STEAM LINE TUNNEL TEMPERATURE INSTRUMENT FT&C" procedure (HNP-2-3107).

This test was previously required every 18 months; however, Tech. Specs. amendment number 39 changed the 18 month interval to a 30 day interval. The plant's surveillance coordinator did not adjust the surveillance frequency; consequently, this event is the result of personnel error.

On 11/29/84 (the second event), during a Q. A. Audit, plant personnel determined that reactor vessel pressure instrumentation (2B21-R623 A, B) and reactor vessel shroud water level instrumentation (2B21-R610 and 2B21-R615) were not receiving monthly channel checks and quarterly channel calibrations per Tech. Specs. table 4.3.6.4-1, item 1 and 4.3.6.4-1, item 2, respectively.

On 3/13/85 (the third event), it was determined that the "PRIMARY CONTAINMENT HYDROGEN RECOMBINER FUNCTIONAL TEST (HEATUP TO 1200 DEG. F.) surveillance procedure (HNP-2-3607) did not meet the acceptance criteria of Tech. Specs. section 4.6.6.2.b.4.

Refer to the narrative for additional items added via Rev. 3.

IE22
1/1

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
EDWIN I. HATCH, UNIT II	0 5 0 0 0 3 6 6	8 4	— 0 3 0	— 0 3	0 2 OF 0 7

TEXT (If more space is required, use additional NRC Form 366A's) (17)

This LER is required by 10CFR50.73(a)(2)(i)(B).

This LER reports five (5) events describing discrepancies in surveillance related areas:

1. First Event:

On 11/15/84, with the unit operating at 2423 MWt (approximately 99% power), the plant's surveillance coordinator determined that the monthly channel functional test had not been performed as required on the main steam line instrumentation for the months of September and October (i.e., by the "latest possible dates of 10/01/84 and 10/31/84 respectively -- these represent the respective due dates of 09/24/84 and 10/24/84 plus the 25% grace period allowed by Tech. Specs. section 4.0.2). The monthly channel functional test is required by Tech. Specs. table 4.3.2-1, item D., as well as by the "MAIN STEAM LINE TUNNEL TEMPERATURE INSTRUMENT FT & " procedure (HNP-2-3107).

When the plant's surveillance coordinator determined (on 11/15/84) that the tests had not been performed as required, he contacted other plant personnel and assured that the test was performed in an expeditious manner (it was performed and satisfactorily completed on 11/15/84). The surveillance schedule for the main steam line instrumentation surveillance has been corrected to reflect the required 30-day interval. The surveillance coordinator was instructed to be more careful in his database revisions.

This test was previously required every 18 months; however, Tech. Specs. amendment number 39 changed the 18 month interval to a 30 day interval. The plant's surveillance coordinator did not adjust the surveillance frequency; consequently, this event is the result of personnel error.

To prevent recurrence of this event, plant personnel will perform an on-site review. This review will consist of a comparison of the following, and assurance that any discrepancies are corrected:

a. the surveillance coordinator's database,

b. the surveillance requirements in the Unit 1 and Unit 2 Tech. Specs., and

c. the applicable plant procedures which implement the surveillance requirements.

2. Second Event:

On 11/29/84 (before the on-site review was completed), with the reactor mode switch in startup and hot standby (0.0% power), and during a surveillance-related Quality Assurance audit, plant personnel determined that further problems existed with the surveillance program:

a. The monthly channel check, and the quarterly channel calibration for the reactor vessel pressure instrumentation (2B21-R623 A,B) was not being performed as required by Tech. Specs. Table 4.3.6.4-1, item 1.

b. The quarterly channel calibration for the reactor vessel shroud water level instrumentation (2B21-R610, R615) was not being performed as required by Tech. Specs. Table 4.3.6.4-1, item 2.

The monthly channel check for the reactor vessel pressure instrumentation (2B21-R623 A,B) was not being performed as required due to personnel error. Tech. Specs. amendment number 39 changed the MPL number of these instruments from 2C32-R605A, B, and C to 2B21-R623 A,B. When the personnel were reviewing the amendment for necessary procedure changes, this change was overlooked. Additionally, the surveillance coordinator failed to ensure that the existing procedures met the Tech. Specs. requirement.

The failure to perform the quarterly channel calibrations at the required frequency was the result of plant personnel erroneously revising the surveillance procedures such that the channel calibration would be performed every 18 months instead of at the quarterly requirement of Tech. Specs. Additionally, the surveillance coordinator had failed to ensure that the surveillance frequency change was consistent with the Tech. Specs. requirement.

Note: Prior to the implementation of Tech. Specs. amendment number 39, the surveillance requirements were being met.

The monthly channel check, and quarterly channel calibration for 2B21-R623 A & B were performed satisfactorily on 11/29/84. The quarterly channel calibration for 2B21-R610 & R615 was performed satisfactorily on 11/29/84.

The monthly channel check was implemented with a Standing Order until the "SURVEILLANCE CHECKS" procedure (HNP-2-1050) was revised on 01/10/85 to do so. The frequency for the channel calibration for the reactor vessel pressure instrumentation (2B21-R623 A,B) was corrected via the 03/13/85 revision of the "REACTOR PRESSURE (500 AND 335 PSIG) INSTRUMENT FT&C" procedure (HNP-2-3173). The "REACTOR WATER SHROUD LEVEL INDICATOR INSTRUMENT F.T. & C." procedure (HNP-2-3170) was revised on 04/12/85 to correct the frequency for the channel calibration of the reactor vessel shroud water level instrumentation (2B21-R610, R615). Additionally, the surveillance program for these surveillance requirements has been revised to meet the requirements of Tech. Specs. Table 4.3.6.4-1, items 1 and 2.

3. Third Event:

The on-site review of the surveillance program was completed on approximately 02/07/85, and no reportable items were identified. However, on 03/13/85, with the reactor operating at 2436 MWt (approximately 100% power), an independent audit group identified a discrepancy between the acceptance criteria in the "PRIMARY CONTAINMENT HYDROGEN RECOMBINER SYSTEM FUNCTIONAL TEST (HEATUP TO 1200 DEG. F.)" procedure (HNP-2-3607) and Tech. Specs. section 4.6.6.2.b.4. This allowed the surveillance to be performed and to not meet the 18 month surveillance requirements of this section of Tech. Specs.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
EDWIN I. HATCH, UNIT 2	0 5 0 0 0 3 6 6	8 4	— 0 3 0	— 0 3	0 4 OF 0 7

TEXT (If more space is required, use additional NRC Form 366A's) (17)

The procedure (HNP-2-3607) incorrectly required that the resistance to ground for any hydrogen recombiner heater phase be equal to or greater than 1 x 10(6) ohms. This is contrary to the requirements of Tech. Specs. section 4.6.6.2.b.4 which requires that the value be equal to or greater than 100 x 10(6) ohms.

This event is the result of personnel error in that the procedure was incorrectly revised on 07/14/83. This revision was based on vendor information that the resistance to ground for any heater element should be equal to or greater than 1 x 10(6) ohms. As a result of this revision, the acceptance criteria was changed to be less conservative than the Tech. Specs. requirement. This revised procedure was used to perform surveillances in July, 1983, and again in August, 1984. This event is reportable per 10CFR 50.73 (a)(2)(i)(B).

When the procedure (HNP-2-3607) error was recognized on 03/13/85 a temporary procedure revision was immediately initiated. The temporary procedure revision provided detailed instructions for the functional test of the hydrogen recombiner systems, as well as acceptance criteria which would satisfy the requirements of Tech. Specs. section 4.6.6.2.b.4.

Subsequent to the temporary procedure revision, a 12 hour LCO was initiated for both hydrogen recombiner systems (2T49-P600A and 2T49-P600B) at 1345 CST on 03/13/85 per Tech. Specs. section 3.6.6.2, ACTION b.

Hydrogen recombiner system 2T49-P600A was then satisfactorily functionally tested per the temporarily revised procedure (HNP-2-3607), and returned to service on 03/13/85 at approximately 2250 CST. The plant remained in a 30 day LCO until hydrogen recombiner 2T49-P600B was satisfactorily functionally tested on 03/14/85 at approximately 0145 CST. At that time the 30 day LCO was terminated because both hydrogen recombiner systems' (2T49-P600A and 2T49-P600B) performance had been verified to meet the requirements of Tech. Specs. section 4.6.6.2.b.4.

During performance of the temporarily revised procedure, each of the hydrogen recombiner systems' (2T49-P600A and 2T49-P600B) heater phases met the resistance to ground requirement of Tech. Specs. section 4.6.6.2.b.4 without corrective action. No evidence exists that equipment problems or degradation of equipment performance resulted from the procedure error.

The "PRIMARY CONTAINMENT HYDROGEN RECOMBINER FUNCTIONAL TEST (HEATUP TO 1200 DEG. F.) surveillance procedure (HNP-2-3607) will be permanently revised to reflect the correct Tech. Specs. acceptance criteria (greater than or equal to 100 x 10(6) ohms resistance to ground for each hydrogen recombiner heater phase) prior to the next scheduled surveillance.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
EDWIN I. HATCH, UNIT 2	0 5 0 0 0 3 6 6	8 4	— 0 3 0	— 0 3	0 5 OF 0 7

TEXT (If more space is required, use additional NRC Form 366A's) (17)

4. Fourth Event:

These discrepancies are reportable per 10CFR 50.73(a)(2)(i)(B) because they demonstrate that plant procedural inadequacies existed which could have allowed the plant to not comply with parts of the Unit 2 Tech. Specs.

The on-site review of the surveillance program was completed on approximately 02/07/85, and no reportable items were identified. However, on 03/25/85, with Unit 2 operating at 2420 MWt (approximately 99% power), an independent audit group identified the following discrepancies :

a. The "DAILY INSIDE ROUNDS" procedure (HNP-2-1060) did not specify an acceptance criteria for the A.C. inverters 2R44-S002 and 2R44-S003. Tech. Specs. section 4.8.2.1.b requires that the output voltage of these inverters be 600 volts plus or minus 5% while they are supplying their respective busses.

   The procedure (HNP-2-1060) is being revised to contain the Tech. Specs. acceptance criteria. In the interim, plant personnel are assuring that the inverters are operable by use of a Standing Order which requires checking their voltages against the Tech. Specs. criteria.

b. The monthly "MAIN STEAM LINE TUNNEL TEMPERATURE INSTRUMENT FT&C" PROCEDURE (HNP-2-3107) contains an acceptance criteria of less than or equal to 194.75 degrees F. This does not satisfy the less than or equal to 194 degrees F acceptance criteria specified by item 1.d of Tech. Specs. Table 3.3.2-2.

   The procedure (HNP-2-3107) was revised on 04/27/85 to satisfy the acceptance criteria specified by item 1.d of Tech. Specs. Table 3.3.2-2.

c. The 18 month "INSTRUMENTATION TIME RESPONSE TESTING COMPARISON WITH TECH. SPECS." procedure (HNP-2-3192) listed the time response testing acceptance criteria of Tech. Specs. table 3.3.3-3 for the applicable system. However, this procedure did not list the time response acceptance criteria for all the individual instruments associated with the systems which required time response testing per Tech. Specs. Table 3.3.3-3. It should be noted that all the required testing was being performed.

   This procedure (HNP-2-3192) was temporarily revised on 05/28/85 to list time response acceptance criteria for all the instruments associated with the systems requiring time response testing per Tech. Specs. Table 3.3.3-3. This temporary revision will be incorporated into a permanent revision prior to the procedure's next performance.

On 03/15/85, using a preliminary version of the audit group's report, plant personnel performed an in-depth review of completed data packages for the procedures mentioned in a, b, and c above. This review of data packages for the past 12 months showed no case where a procedural deficiency had allowed non-compliance with Tech. Specs. Thus, this event had no effect on safe operation of the plant or on public health and safety.

These events were the result of personnel error. The individual procedures are being (have been) corrected as noted. The procedure upgrade program that Plant Hatch is currently implementing should preclude recurrence of this type event.

5. Fifth Event:

These discrepancies are reportable per 10CFR 50.73(a)(2)(i)(B) because they demonstrate that plant procedural inadequacies existed which could have allowed the plant to not comply with parts of the Unit 1 and/or Unit 2 Tech. Specs.

The on-site review of the surveillance program was completed on approximately 02/07/85, and no reportable items were identified. However, on 03/25/85, with Unit 1 operating at 2235 MWt (approximately 92% power), an independent audit group identified the following discrepancies:

a. The monthly "HIGH SCRAM DISC. VOLUME LEVEL FLOAT SW. INSTRUMENT FT&C" surveillance procedure (HNP-1-3004) contained an acceptance criteria of 18 gallons plus or minus 2 gallons. This does not satisfy the scram discharge volume high water level trip setting of less than or equal to 18 gallons as required by item 5 of Tech. Specs. table 3.2-7.

   The procedure (HNP-1-3004) was temporarily revised (and satisfactorily performed) on 04/11/85 to satisfy the Tech. Specs. acceptance criteria. The procedure was permanently revised on 05/07/85 to satisfy the Tech. Specs. acceptance criteria.

b. The "REACTOR RECIRCULATION PUMP MOTOR PROTECTION SYSTEM INTEGRATED F.T." procedure (HNP-1-3457) permits alternate RPT (reactor recirculating pump trip) systems to be tested every 18 months such that the whole system is tested every 36 months. This is contrary to the requirement of item 3.b of Tech. Specs. table 4.2.9 that both systems be tested every operating cycle.

   The procedure (HNP-1-3457) will be revised to reflect the correct frequency prior to its next scheduled use.

c. The "RPT INITIATION LOGIC F.T. AND MG SET TIME RESPONSE TEST" procedure (HNP-1-3459) permits alternate channels to be tested for the time response test every 18 months. This is contrary to the requirement of item 3.c of Tech. Specs table 4.2.9 that both channels be tested every operating cycle.

   The procedure (HNP-1-3459) will be revised to reflect the correct frequency prior to its next scheduled use.

d. The monthly "REACTOR BUILDING EXHAUST VENT RADIATION MONITOR INSTRUMENT FT&C" procedure (HNP-1-3553) acceptance criteria of 20 mr/hr plus or minus 10% trip setpoint for the building potentially contaminated area HI-HI radiation alarm and light (1D11-K609) does not satisfy the less than or equal to 20 mr/hr requirement of item 3 of Tech. Specs. table 3.2-8.

The procedure (HNP-3553) was performed (without permanent or temporary revision) on 03/21/85, 04/12/85, and 05/15/85. An investigation by plant personnel determined that on each of these times, the reactor building exhaust vent radiation monitors (1D11-K609A-D) were within the Tech. Specs. limit, except that 1D11-K609A was left at 22 mr/hr on 03/21/85. This had no adverse affect on plant operation since the other three monitors remained within the Tech. Specs. limit, and the slight non-conservative value at which 1D11-K609A was left did not actually render it inoperable.

The procedure (HNP-3553) is currently being revised to contain the Tech. Specs. acceptance criteria for item 3 of Tech. Specs. table 3.2-8. The procedure will be temporarily revised (for each performance) to satisfy the Tech. Specs. acceptance criteria until the permanent revision is in place.

e. The 18-month "MAIN CONTROL ROOM ISOLATION AND PRESSURIZATION LSFT" procedure (HNP-1-3555) does not require verification of positive control room pressure following each of the pressurization made signals during main control room environmental control system testing as required by Unit 2 Tech. Specs. section 4.7.2.e.3.

The plant's interpretation of the Tech. Specs. requirement is that a separate control room positive pressure test for each pressure mode actuation signal is not required. Each test signal listed in Unit 2 Tech. Specs. section 4.7.2.e.3 produces the identical control room ventilation response via the same logic train. Therefore, if the first initiation logic signal tested produces the desired control room pressurization, then the remaining initiation signals should only have to be tested up to the common logic initiation point. This is what the procedure does.

On 03/15/85, using a preliminary version of the audit group's report, plant personnel performed an in-depth review of completed data packages for the procedures mentioned in a thru e above. This review of data packages for the past 12 months showed only the case detailed in d where a procedural deficiency had allowed non-compliance with Tech. Specs. Thus, this event had no adverse effect on safe operation of the plant or public health and safety.

These events were the result of personnel error. The individual procedures are being (have been) corrected as noted. The procedure upgrade program that Plant Hatch is currently implementing should preclude recurrence of this type event.

Georgia Power Company
Post Office Box 439
Baxley, Georgia 31513
Telephone 912 367-7781
912 537-9444

Georgia Power

Edwin I. Hatch Nuclear Plant

July 1, 1985
GM-85-628

PLANT E. I. HATCH
Licensee Event Report
Docket No. 50-366

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Attached is Licensee Event Report No. 50-366/1984-030, Rev. 3. This report is required by 10CFR50.73(a)(2)(i)(B).

for H. C. Nix
General Manager

HCN/SBT/vlz

xc: R. J. Kelly
R. E. Conway
J. T. Beckham, Jr.
P. D. Rice
K. M. Gillespie
D. R. Altman
Superintendent of Regulatory Compliance
R. D. Baker
Control Room
Document Control

IE22
1/1