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NED-85-414
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May 29, 1985

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

Reference:
RII: RDW
50-321,366
IER 85-09

ATTENTION: Dr. J. Nelson Grace

Georgia Power Company hereby provides the following information in response to the alleged violations cited in NRC I&E Report 50-321,366/85-09 dated April 22, 1985. The subject violations were identified during the NRC inspection conducted at Plant Hatch by Mr. P. Holmes-Ray and Mr. C. Brooks of your staff on February 23 to March 24, 1985.

VIOLATION 1:

Technical Specification 6.8.1.c requires that written procedures be established covering surveillance and test activities of safety-related equipment.

Contrary to the above, written procedures were not established for Units 1 and 2 on February 28, 1985, to cover the following Technical Surveillance Requirements on safety-related systems:

- a. Unit 1 Technical Specifications 4.6.D and 4.6.E require the permanent recording of reactor coolant temperatures in the operating loop, idle loop, steam dome and bottom head drain prior to startup of an idle recirculation loop. Retention of recorder tapes for these parameters is 5 years vs. permanent and no other logging is specified by Hatch procedures.
- b. Unit 1 Technical Specifications 4.6.A and Unit 2 Technical Specifications 4.4.6.1.1 require that reactor coolant system temperature and pressure be verified within limits at least every 30 minutes during reactor coolant heatup and cooldown.
- c. Unit 2 Technical Specifications 4.4.6.1.2 requires that reactor coolant system temperature and pressure be verified within limits within 15 minutes prior to withdrawal of control rods to bring the reactor critical.

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

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U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
May 29, 1985
Page 2

RESPONSE TO VIOLATION 1:

Admission or denial of alleged violation: The violation occurred.

Reason for Violation 1a: The failure to establish adequate written procedures for Unit 1 Technical Specifications 4.6.D and 4.6.E resulted from an oversight.

Corrective steps which have been taken and the results achieved for Violation 1a: Recorder 1B31-R650 tape retention requirement was changed to permanent retention. Operations Standing Order 85-19 was issued requiring the dome and the bottom head drain temperatures to be recorded in the plant operator's log and verified to be less than the limits. This interim action is adequate until the affected procedure is revised.

Corrective steps which will be taken to avoid further violations for Violation 1a: The procedure governing startup of the reactor recirculation pumps, HNP-1-1435, will be revised to require the necessary temperatures noted above be recorded in the plant operators log and verified within limits. The procedure will be revised by August 21, 1985. In addition, a review of the need for a line-by-line check of conditional requirements, conditional surveillances, and periodic surveillances to insure that the applicable procedures completely address the requirements of Technical Specifications will be performed by August 21, 1985.

Reason for Violation 1b: The failure to establish written procedures for Unit 1 Technical Specifications 4.6.A and Unit 2 Technical Specifications 4.4.6.1.1 resulted from a misinterpretation of Technical Specifications requirements. Plant startup and shutdown procedures require that the reactor coolant system temperature be plotted at 30 minute intervals. Temperature was plotted during the heatup in question. During the time that steam is being produced, General Electric's Boiling Water Reactor operates under saturated conditions. Therefore, one could assume that system pressure is within limits when the corresponding saturation temperature is verified within limits. Thus the failure to specify verification of pressure.

Corrective steps which have been taken and the results achieved for Violation 1b: Operations standing orders 85-17 for Unit 1 and 85-18 and 85-25 for Unit 2 were issued requiring operators to verify reactor coolant system temperature and pressure within limits during startup and shutdown. This interim action is adequate until the affected procedures are revised.

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
May 29, 1985
Page 3

Corrective steps which will be taken to avoid further violations for Violation 1b: Plant startup and shutdown procedures HNP-1,2-1001, 1010, and 1020, will be revised to incorporate reactor coolant system pressure verification. The procedures will be revised by August 21, 1985.

Reason for Violation 1c: The failure to establish written procedures for Unit 2 Technical Specifications 4.4.6.1.2 resulted from an oversight.

Corrective steps which have been taken and the results achieved for Violation 1c: Operations Standing Order 85-18 was issued requiring the operator to verify reactor coolant system temperature and pressure within limits within 15 minutes prior to withdrawal of control rods to bring the reactor critical. This verification will be documented by entering "acceptable" or "unacceptable" in the appropriate section of HNP-2-1050. This interim action is adequate until the affected procedure is revised.

Corrective steps which will be taken to avoid further violations for Violation 1c: Plant startup procedure, HNP-2-1001, will be revised to require verification of the necessary parameters within 15 minutes prior to withdrawal of the control rods to bring the reactor critical. The procedure will be revised by August 21, 1985. As per the response to violation 1a above, a review of the need for a line-by-line check of conditional requirements, conditional surveillances, and periodic surveillances to insure that applicable procedures completely address the requirements of Technical Specifications will be performed by August 21, 1985.

Date when full compliance was achieved: Full compliance was achieved on March 8, 1985, when Standing Orders 85-17, 85-18, 85-19, and 85-25 were issued.

VIOLATION 2:

Technical Specification 3.6.B requires that:

The reactor vessel shell temperatures during inservice hydrostatic or leak testing shall be at or above the higher of the temperatures shown on the curves of Figure 3.6-2 where the dashed line curve, RPV core beltline region is increased by the expected shift in RT_{NDT} from Figure 3.6-1.

During heatup by non-nuclear means, cooldown following nuclear shutdown or low level physics tests, the reactor vessel shell and fluid temperatures of Specification 4.6.A shall be at or above the higher of

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
May 29, 1985
Page 4

VIOLATION 2 (Continued):

the temperatures shown on the curves of Figure 3.6-3 where the dashed line curve, initial core beltline region is increased by the expected shift in RT_{NDT} from Figure 3.6-1.

During all operation with a critical core, other than for low level physics tests, the reactor vessel shell and fluid temperatures of Specification 4.6.A shall be at or above the higher of the temperatures shown on the curves of Figure 3.6-4 where the dashed line curve, initial core beltline region is increased by the expected shift in RT_{NDT} from Figure 3.6-1.

Contrary to the above, the licensee did not have a procedure issued to implement the requirements of Technical Specification 3.6.B nor did the licensee perform the required corrections of the stated curves.

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

RESPONSE TO VIOLATION 2:

Admission or denial of alleged violation: The violation occurred.

Reason for the violation: The failure to establish written procedures to implement Technical Specification 3.6.B was the result of an oversight. The failure to compute and apply corrections for fluence to the referenced curves was the result of existing procedures being inadequate to perform the necessary computations. When proper periodic computations were performed, the data indicated the feedwater nozzle curves to be more limiting. More recently, upon applying the corrections for fluence to the curves, the reactor vessel beltline curve was the limiting curve. No violations of the composite limiting curve correctly adjusted for fluence have occurred.

Corrective steps which have been taken and the results achieved: Operations Standing Order 85-17 was issued to provide the instructions and data to make the necessary computations and apply the corrections for fluence to the curves. This interim action is adequate until the affected procedures are revised or written as necessary.

Corrective steps which will be taken to avoid further violations: A plant procedure will be developed or revised to provide instructions for using the curves in Technical Specifications 3.6.B. Procedure HNP-1-1050 will be revised to include the results of the computed

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
May 29, 1985
Page 5

RESPONSE TO VIOLATION 2 (Continued)

corrections for fluence on a daily basis. The procedures will be revised by August 21, 1985. As per the response to violation 1a above, a review of the need for a line-by-line check of conditional requirements, conditional surveillances, and periodic surveillances to insure that applicable procedures completely address the requirements of Technical Specifications will be performed by August 21, 1985.

Date when full compliance was achieved: Full compliance was achieved on March 8, 1985, when Standing Order 85-17 was issued.

VIOLATION 3:

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

Contrary to the above:

- a. Procedure HNP-1-3407, Suppression Chamber Delta Temperature (RCIC) Instrumentation Functional Test and Calibration, was not properly implemented in that on January 23, 1985 personnel placed clearance hold tags on the Traveling Incore Probe (TIP) mode switches vs. the drive switches as required by Procedure HNP-1-3407. This resulted in the TIP ball valves being unable to automatically shut upon receipt of a Group 2 Primary Containment Isolation System (PCIS) signal as required by Technical Specifications Table 3.7-1.
- b. Procedure HNP-1-3417, RCIC Pump Suction Pressure Instrument Functional Test and Calibration, and Technical Specification Table 4.2-3 Item 4, require monthly instrument functional test for RCIC pump suction pressure instrument. Procedure HNP-1-3417 was not properly implemented in that the required surveillance test was not performed within the specified frequency time limits due to personnel error.
- c. Procedure HNP-2-3410, RCIC Steam Line Delta Pressure Instrument Functional Test and Calibration, was not properly maintained in that a revision was issued to the procedure which contained engineering errors resulting in an improper and non-conservative set point for RCIC steam line differential pressure. This is contrary to Technical Specification Table 3.3.2-2 Item 5.

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

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
May 29, 1985
Page 6

RESPONSE TO VIOLATION 3:

Admission or denial of alleged violation: The violation occurred.

Reason for violation 3a: The failure to properly implement procedure HNP-1-3407, Suppression Chamber Delta Temperature (RCIC) Instrumentation Functional Test and Calibration, was the result of personnel error. Personnel placed clearance hold tags on the TIP machine's mode switches instead of the drive control switches. The mode switches were also moved to the off position, thus rendering the TIP ball valve automatic isolation function inoperable. The TIP outboard primary containment isolation valves remained operable in the manual mode.

Corrective steps which have been taken and the results achieved for violation 3a: Immediately upon discovery of the improperly hung tags, the clearance hold tags were placed on the proper switches and the TIP machine energized. The personnel responsible for hanging the clearance hold tags on the wrong TIP machine switches were instructed on proper clearance procedures. The event was thoroughly discussed at operations shift briefings.

Corrective steps which will be taken to avoid further violations for violation 3a: The above actions are sufficient to prevent recurrence.

Date when full compliance was achieved for violation 3a: Full compliance was achieved on January 23, 1985 when clearance tags were properly hung and the TIP machine was re-energized.

Reason for Violation 3b: The failure to properly implement procedure HNP-1-3417, RCIC Pump Suction Pressure Instrument Functional Test and Calibration, was the result of personnel error. The surveillance computer tracking sheet, designating the dates between which the procedure must be performed, had been signed off indicating that this procedure had been performed. The individual who previously signed off the procedure realized he had inadvertently signed off the wrong procedure and placed a single line through the completion date for HNP-1-3417. This line was meant to denote that the procedure had not been performed. However, the line was very fine in comparison to the signature and therefore, was overlooked. Other shop personnel were not aware that the procedure had not been performed until after the latest performance date.

Corrective steps which have been taken and the results achieved for violation 3b: Both supervisors and the technicians involved reviewed the serious nature and the root cause of this incident. Personnel were instructed on correction of mistakes on plant documents so that the corrections are readily apparent.

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
May 29, 1985
Page 7

RESPONSE TO VIOLATION 3 (Continued):

Corrective steps which will be taken to avoid further violations for violation 3b: The above actions are sufficient to prevent recurrence.

Date when full compliance was achieved for violation 3b: Full compliance was achieved on February 27, 1985 when HNP-1-3417 was properly performed.

Reason for violation 3c: The improper implementation of procedure HNP-2-3410, RCIC Steam Line Delta Pressure Instrument Functional Test and Calibration, was caused by a deficient procedure which resulted from a personnel error. During a biennial review of HNP-2-3410, plant personnel determined that the calibration head correction data for RCIC steam line differential pressure transmitters 2E51-NO57A and 2E51-NO57B was incorrect due to installation of new instruments. The new RCIC steam line differential pressure transmitters were installed during the Unit 2 recirculation piping outage per a Design Change Request (DCR) as part of the Analog Transmitter Trip System (ATTS) modification. After installation, the transmitter spans were calculated (including static head correction) to input current into their respective trip units so that the trip units would isolate RCIC at equal to or less than 312% rated steam flow per Technical Specifications Table 3.3.2-2. However, the static head corrections were mistakenly applied to the incorrect side of each differential pressure transmitter. The calibration head correction data that should have applied to the low side of the transmitters was mistakenly applied to the transmitters' high side, and vice versa. The error was incorporated into procedure HNP-2-3410 per the DCR related revision. Consequently, using the erroneous procedure, transmitter 2E51-NO57A was calibrated to produce an isolation signal at approximately 316% of rated steam flow vice 312%. Transmitter 2E51-NO57B was calibrated, although conservatively, to produce an isolation signal at approximately 200% vice 312%. It should be noted that other RCIC steam line isolation instrumentation was available which would have isolated RCIC in the event of a RCIC steam line break and subsequent temperature rise.

Corrective steps which have been taken and the results achieved for violation 3c: A Limiting Condition for Operation was initiated immediately upon discovery. RCIC was isolated and declared inoperable at approximately 0950 CST on January 24, 1985. HNP-2-3410 was revised and pressure transmitters 2E51-NO57A and 2E51-NO57B were calibrated correctly. RCIC was satisfactorily returned to service at approximately 2120 the same day. The individual responsible for determining the incorrect calibration head correction data was instructed on proper calibration techniques.

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
May 29, 1985
Page 8

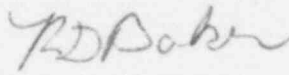
RESPONSE TO VIOLATION 3 (Continued):

Corrective steps which will be taken to avoid further violations for violation 3c: The above actions are sufficient to prevent recurrence.

Date when full compliance was achieved for violation 3c: Full compliance was achieved on January 24, 1985.

Should you have any questions in this regard, please contact this office.

Sincerely yours,


for L. T. Gucwa

MJB

xc: J. T. Beckham, Jr.
H. C. Nix, Jr.
J. N. Grace (NRC- RII)
Site Resident Inspector