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

October 30, 1996



Docket No. 50-321

HL-5257

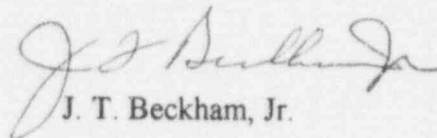
U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

Edwin I. Hatch Nuclear Plant - Unit 1  
Reply to a Notice of Violation

Gentlemen:

In response to your letter dated October 11, 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 96-11. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Sincerely,



J. T. Beckham, Jr.

DLM/eb

Enclosure: Violation 96-11-02 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. Ebnetter, Regional Administrator  
Mr. B. L. Holbrook, Senior Resident Inspector - Hatch

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## Enclosure

### Edwin I. Hatch Nuclear Plant Violation 96-11-02 and GPC Response

#### VIOLATION 96-11-02

10 CFR 50.55a, Codes and Standards, Paragraph (g), Inservice Inspection Requirements, requires that inspection and testing be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. ASME Section XI IWA-4600(A) requires a re-examination following a repair by machining.

Unit 1 Technical Surveillance Requirement 3.4.2.1 of the Technical Requirements Manual states, in part, to perform required inspection and testing in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a(g), as modified by approved relief.

Contrary to the above:

Between April 14, 1996, and May 1, 1996, while implementing Design Change Request 94-033 on valve 1E41-F006, High Pressure Coolant Injection Valve, gouges in the bonnet at the gasket seating area were removed by machining and a VT-3 reinspection was not completed. As a result, an inspection required by section XI of the ASME Boiler and Pressure Vessel Code was not performed.

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

#### RESPONSE TO VIOLATION 96-11-02

##### Reason for the violation:

The violation was the result of personnel error. Responsible personnel failed to recognize a VT-3 inspection was required following the completion of repair work on valve 1E41-F006. As a result, the valve was reassembled without the inspection having been performed.

A Quality Control Inspection Report was initiated subsequent to the discovery of the gouge in the bonnet at the gasket seating area. A Quality Control hold point was assigned to ensure the Quality Control Inspection Report was resolved prior to the valve being reassembled; however, the report was not resolved adequately. A GPC engineer signed the Quality Control Inspection Report as resolved after the gouge was repaired. Similarly, a GPC Quality Control Specialist signed the Quality Control Inspection Report and released the hold point after repair work was completed. Neither individual recognized a

VT-3 reinspection of the repaired area was necessary; consequently, the hold point was released and the valve was reassembled without performing the inspection required by the ASME Code and the Technical Requirements Manual.

Corrective steps which have been taken and the results achieved:

As a result of this event, the following corrective actions were taken:

1. Involved GPC personnel were counseled regarding this event and its consequences.
2. An operability and structural integrity assessment for valve 1E41-F006 was performed concluding the valve is operable and structurally intact. This conclusion is based upon successful completion of stroke time, local leak rate, and Generic Letter 89-10 testing along with successful completion of a VT-2 leakage inspection of this valve during the vessel hydrostatic test. The assessment is documented in detail in the response to Significant Occurrence Report CO9603642.
3. Maintenance Work Order 1-96-2647 was written to disassemble and perform a VT-3 inspection of the bonnet of valve 1E41-F006. This inspection will be performed during the next Unit 1 refueling outage currently scheduled to begin in October of 1997.

Corrective steps which will be taken to avoid further violations:

No additional corrective actions to prevent further violations are necessary at this time.

Date when full compliance will be achieved:

Full compliance with Technical Requirements Manual and ASME Code requirements will be achieved when the bonnet of valve 1E41-F006 is inspected during the next Unit 1 refueling outage.