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the southern electric system

NED-85-658
2109N

September 13, 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
Inspection Report
85-22

ATTENTION: Dr. J. Nelson Grace

Gentlemen:

Georgia Power Company (GPC) submits the following response to NRC Inspection Report 50-321/85-22 and 50-366/85-22, dated August 14, 1985 concerning the inspection period of June 29 - July 26, 1985 for Plant Hatch Units 1 & 2. Two apparent violations were identified.

VIOLATION 1:

10 CFR 50, Appendix B, Criterion X, as implemented by Section A.33 of the Hatch Unit 2 FSAR, requires the licensee to comply with ANSI N18.7-1976. Section 5.2.7 of ANSI N18.7-1976 specifies that maintenance and modifications which may affect functioning of safety-related systems be performed in a manner to ensure quality at least equivalent to that specified in original design bases and requirements. It also specifies that a suitable level of confidence in systems on which maintenance or modifications have been performed shall be attained by appropriate inspection.

Contrary to the above, the bypass valve (2E11-F122B) for the residual heat removal system check valve (2E11-F050B) was found not to contain all of its internal parts when opened on April 10, 1985. This bypass valve had been disassembled during the 1984 Unit 2 outage and no documented work had been performed on 2E11-F122B since that outage and prior to April 10, 1985.

This is a Severity Level IV violation (Supplement I) for Unit 2 only.

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RESPONSE TO VIOLATION 1:

Admission or denial of alleged violation: The violation occurred.

Reason for the violation: This incident was an isolated instance of inadequate procedural control of the maintenance work activity. During the Recirculation System Pipe Replacement Outage in 1984, the bypass valve and attached piping was removed to replace the check valve and was subsequently rewelded in place. The work was performed using a Controlled Work Instruction (CWI) for the removal and subsequent replacement which had no provisions for ensuring the bypass valve internals were in place. The internals of this particular valve can easily fall out if the valve is turned over, such as for grinding prior to rewelding to the pipe. This incident was isolated to the 2E11-F122B valve. The 2E11-F122A valve was also repaired during the same outage, using the same CWI, and tested in conjunction with the leak rate test for 2E11-F050A. The leak rate acceptance criterion was met, indicating that the 2E11-F122A valve had been repaired and installed correctly.

Corrective steps which have been taken and the results achieved: Prior to Reactor Startup on May 22, 1985, the valve internals were replaced and 2E11-F122B was tested in conjunction with the leak rate test for 2E11-F050B. The leak rate acceptance criterion was met, indicating that the 2E11-F0122B valve was repaired and installed properly. The Administrative Control Procedure for the Maintenance Program, 50AC-MNT-01, which was effective subsequent to the event, was revised to require a Maintenance Work Order (MWO) for all plant related maintenance activities. The MWO process will provide review for adequate functional tests before authorization of work commencement and establishment of quality control hold points to observe critical steps.

Corrective steps which will be taken to avoid further violations: The corrective steps noted above are sufficient to prevent recurrence.

Date when full compliance was achieved: Full compliance was achieved on May 22, 1985.

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VIOLATION 2:

Technical Specification 6.8.1.C requires that written procedures be implemented and maintained covering surveillance and test activities of safety-related equipment.

Contrary to the above, the following safety-related calibration procedures incorrectly referenced the filing codes, which are used to locate vendor technical manuals in the site document room:

- a. HNP-1-5251, Revision 11, and HNP-2-5251, Revision 5, General Electric Type 547 Self Synchronizing Manual/Automatic Transfer Station.
- b. HNP-2-5255, Revision 2, GE 562 Limiter Calibration.
- c. HNP-2-5273, Revision 6, Model 195-4 Mercoid Level Switch.
- d. HNP-1-5261, Revision 16, Agastat Timing Relay Calibration.

This is a Severity Level V Violation (Supplement I) for Units 1 and 2.

RESPONSE TO VIOLATION 2:

Admission or denial of alleged violation: The violation occurred.

Reason for violation: The procedures were incorrect because changes or revisions to the vendor manuals were not incorporated into the affected procedures. There was no formal mechanism to assure consistent incorporation of vendor manual updates into the affected procedures.

The corrective steps which have been taken and the results achieved: Procedures for Vendor Manual Review, 42EN-ENG-007-OS, and Vendor Manual Control, 20AC-ADM-003-OS, were implemented on July 17, 1985. These procedures contain provisions for manual revisions and reviewing the affected procedures to ensure the correct manual numbers are referenced in the affected procedures. Specifically, Document Control will be notified, by the cognizant department, if a manual is to be used as a procedure reference. In turn, Document Control will notify the affected Department Manager if a revision to a manual has been received. Document Control will then track the item until it is incorporated into the affected procedure.

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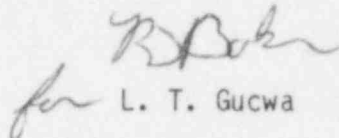
RESPONSE TO VIOLATION 2: (Continued)

Corrective steps which will be taken to avoid further violations: The incorrect references identified in the audit will be corrected. Incorrect references identified in the future will be corrected through a procedure revision.

The date when full compliance will be achieved: Incorrect references identified in the audit will be corrected by October 15, 1985.

If you have any questions, please contact this office.

Very truly yours,


for L. T. Gucwa

MJB/lc

xc: J. T. Beckham, Jr.
H. C. Nix, Jr.
Senior Resident Inspector