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1907N

September 23, 1985

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz, Chief
Operating Reactors Branch No. 4
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2
RESPONSE TO REQUEST FOR INFORMATION
GENERIC LETTER 83-28 ITEM 1.1, POST TRIP REVIEW

Gentlemen:

In response to your letter and SER dated June 7, 1985, Georgia Power Company (GPC) provides the following information related to Plant Hatch practices and procedures for post trip reviews. As stated in previous responses dated November 7, 1983 and February 29, 1984, we believe that practices and procedures in place at Plant Hatch meet or exceed the NRC intent to assure plant safety prior to a restart following an unplanned shutdown.

We note that plant procedure 42EN-ENG-011-OS (formerly HNP-426) "SCRAM/TRANSIENT REPORTING", which is enclosed as Attachment 1, was used extensively by INPO and other utilities as an example of a good practice for post-trip reviews during the industry activities on this subject following the Salem events. In addition, the NRC should note that plant procedures such as 42EN-ENG-011-OS should not be viewed independently of the entire body of plant procedures. For example, by procedure a Nuclear Operations Duty Officer and the Vice President and General Manager Nuclear Operations are promptly notified of every scram. Corporate directives regarding plant

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operations control require the cause of a scram to be investigated and determined before the reactor is returned to power. If after a thorough investigation, the cause of the scram cannot be determined, the Plant General Manager with the concurrence of the Plant Review Board may authorize the return of the reactor to power. Addressing the broader issue of assuring plant safety, the level of management responsibility involved in restart decisions, in conjunction with the technical review procedures, represents an approach which significantly exceeds the "good practice" recommendation of the NRC evaluation criteria.

The NRC evaluation of Plant Hatch post-trip reviews is restated, followed by the GPC position on that evaluation item:

NRC EVALUATION

- A. With regard to the criteria for determining the acceptability of restart, the licensee referred to the plant procedure, HNP-13, "Authority to Startup and Shutdown Plant," which requires that the cause of a scram or an unexplained power transient be investigated and determined prior to the reactor being returned to power. We find that this action taken by the licensee is not sufficient to ensure safe plant operation. We recommend that the licensee establish restart criteria in accordance with the guidelines as described in the above Section II.A.

GPC POSITION

As stated previously, a single procedure should not be viewed independently of the entire body of plant procedures to draw a general conclusion. Furthermore, the NRC evaluation ignores a significant requirement of HNP-13 that was discussed in our previous submittal on the subject: the plant General Manager (GM) has the responsibility for all plant restarts. This level of responsibility is much higher than that assumed in the NRC review criteria, and exceeds those criteria as explained below.

Through the use of procedure 42EN-ENG-011-OS "SCRAM/TRANSIENT REPORTING" the following actions are accomplished:

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1. determine the initial conditions, the cause, and the sequence of events during the scram/transient;
2. determine the integrated system response during the event, including the reactor systems, the balance of plant systems, and safety systems;
3. determine reporting requirements for NRC, plant and corporate management, INPO NETWORK (conferencing system with other utilities), and the GPC load dispatcher;
4. determine the need for near-term corrective actions; and
5. determine if there are unresolved safety concerns which would preclude return to power operation.

Plant procedure 42EN-ENG-011-OS "SCRAM/TRANSIENT REPORTING" directs the collection and documentation of all pertinent information concerning a scram or significant transient and the analysis of the plant response at appropriate levels to determine if corrective actions are needed prior to returning a unit to service. For example, during or following a significant transient, control room personnel, normally the Shift Technical Advisor (STA), record appropriate plant data. Data recorded include any abnormalities noticed during the event. The data package includes items to be checked to confirm both logic system operation and integrated system response to the transient. The reviewer determines the range of values for relevant parameters during the transient and confirms that expected actions did occur. Additionally, the procedure provides the mechanism so that system responses can be compared to expected or historical responses. Any problems noted are immediately reported to the senior on-shift operations supervisor.

The STA group has primary responsibility for performing this more in-depth analysis. Any department may, however, be requested to perform specific reviews or initiate investigations into system response or operation. Any item which cannot be effectively analyzed by on-site personnel is referred to off-site support personnel.

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The Manager of Operations, or his alternate, is responsible for reviewing the event and subsequent analysis and makes a recommendation to the plant General Manager, or his alternate, on the capability of resuming safe power operation. As noted above, restart authority resides with the Plant General Manager and cognizance of the scram events extends to senior executive levels of corporate management.

As a final note on this subject, HNP-13 referenced in previous GPC correspondence and in the NRC evaluation has been superseded as part of an overhaul of all plant procedures. Responsibilities and authorities of plant management positions, including responsibility for start-up authorizations, are now defined in procedures 10AC-MGR-001-0, 10AC-MGR-002-0, and 30AC-OPS-003-0.

NRC EVALUATION

- B. The responsibilities and authorities of the personnel who will perform the review and analysis have not been clearly defined. We recommend that the post-trip review team include a member of plant management at the Shift Supervisor level or above who holds or has held an SRO license on the plant and who has the responsibility and authority to obtain all necessary personnel and data to ensure a thorough and complete post-trip review. In addition, the post-trip review team should include an STA or an engineer who has had special transient analysis training. These two people should have a joint responsibility to concur on a decision/recommendation to restart the plant.

GPC POSITION

As noted previously, the authority to restart the reactor resides at a level which exceeds the "good practice" review criteria. Post trip reviews are the responsibility of the Shift Technical Advisor (STA) organization in accordance with procedure 42EN-ENG-011-0S. Qualification, training, and experience of the STAs at Plant Hatch ensure that competent personnel with qualifications which meet or exceed the evaluation criteria perform the review. Many of the STAs are SRO-licensed or are pursuing an SRO license. In addition, the STAs have the

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responsibility and authority to obtain all necessary personnel and data to ensure that the post trip review is thorough and complete. The data collected are extensive, ensuring that the event and the plant response are thoroughly analyzed and reported. As a practical matter, on-shift operations personnel routinely become involved in the post trip review during post-event interviews or during a formal debriefing. (Section 7.2.3 of 42EN-ENG-011-OS).

Following completion of the review and documentation of the data and results on the data packages, the report is reviewed by the Operations Supervisor on Shift (OSOS) or the Manager of Operations who are SRO licensed. If the root cause of the event is understood and all systems responded normally, the OSOS or the Manager of Operations recommends a restart to the General Manager. If the root cause is not understood, or if the plant response was not as expected, the OSOS or Manager of Operations recommends further investigation which may involve review by the Plant Review Board (PRB).

NRC EVALUATION

- C. The licensee has not addressed the methods and criteria for comparing the event information with known or expected plant behavior. We recommend that the pertinent data obtained during the post-trip review be compared to the applicable data provided in the FSAR to verify proper operation of the systems or equipment. Where possible, comparisons with previous similar events should be made.

GPC POSITION

The evaluation of a transient using 42EN-ENG-011-OS, "SCRAM/TRANSIENT REPORTING", meets the evaluation criteria in that it includes a detailed examination of significant plant parameters. A comparison with safety system or other applicable setpoints is made to verify proper operation of those systems. The procedure systematically evaluates performance of the safety related and other important equipment as identified by the evaluation criteria and assesses that performance to verify proper functioning. A comparison with previous events is performed if appropriate. See the attachment for additional detail on this subject.

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NRC EVALUATION

- D. The licensee has not addressed the criteria for determining the need for independent assessment of an event. We recommend that if any of the review guidelines (as stated in Section II.A of this SER) are not met, an independent assessment of the event should be performed by the PORC or group with similar authority and experience.

GPC POSITION

The ultimate authority and responsibility for restart is assigned to the plant General Manager who serves as the chairman of the PRB and to whom the PRB is subordinate. The review and approval process already in place at Plant Hatch assures that a significant event is detected and appropriately reviewed or referred to off-site support groups for additional analysis.

The NRC evaluation restated above assumes that the Shift Supervisor makes the restart decision, and thus recommends rigid adherence to criteria for making the recommendation for an independent review. At Plant Hatch, on the other hand, the decision to recommend further investigation and review of an event is made by the OSOS or the Manager of Operations following his review of the transient report. The individual is in a position to judge if the the event is significant and should be further reviewed by the PRB or by consultants and vendors who designed the involved systems. As a further supplement to this individual's judgment of the event's significance, the GM must approve the restart before the plant is returned to service.

NRC EVALUATION

- E. The licensee has not provided for our review a systematic safety assessment program to assess unscheduled reactor trips. We recommend that the licensee develop a systematic safety assessment program to handle unscheduled reactor trips.

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GPC POSITION

42EN-ENG-011-OS "SCRAM/TRANSIENT REPORTING" is systematic, and includes a detailed review of both safety related and other important plant functions. Georgia Power, therefore, considers 42EN-ENG-011-OS "SCRAM/TRANSIENT REPORTING" an acceptable safety assessment of the plant following a reactor transient. A copy of that procedure is attached for your review.

Please contact this office if you have any questions or comments.

Very truly yours,



L. T. Gucwa

WEB:PLS/mb

Attachment

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