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December 19, 1996

Docket Nos. 50-321  
50-366

HL-5289

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

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

Gentlemen:

In response to your letter dated November 25, 1996, and according to the requirements of 10 CFR 2.201, Georgia Power Company (GPC) is providing the enclosed response to the Notices of Violation associated with Inspection Report 96-13. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Sincerely,

J. T. Beckham, Jr.

JAW/eb

Enclosures:

1. Violation 96-13-03 and GPC Response
2. Violation 96-13-05 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 1

Edwin I. Hatch Nuclear Plant  
Violation 96-13-03 and GPC Response

VIOLATION 96-13-03

Hatch Technical Specification 5.4 requires that written procedures be established, implemented, and maintained covering activities delineated in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978.

RG 1.33, Appendix A: Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors, paragraph 1.c recommends procedures for equipment control, paragraph 9 recommends procedures for performing maintenance, paragraph 9.e.(1) recommends methods for obtaining permission and clearance for personnel to work, and paragraph 7.e(4) (sic) recommends written procedures for contamination control.

Procedure 30AC-OPS-001-0S, Control of Equipment Clearances and Tags, Revision 15, Step 8.7.1.3 stated in part, that a clearance is to be performed by positioning the component and securing danger tags to the component indicated by the master parts list and/or location of the component.

Procedure 51GM-MNT-017-0S, Control of Lubricants, Revision 1, Section 7.2.4 stated, in part, that lubricant containers will be marked so the lubricants contained therein can be easily identified.

Procedure 60AC-HPX-007-0S: Control of Radioactive Materials, Rev. 3, Step 8.1, stated, in part, that equipment, parts, material and waste which have fixed surface contamination levels exceeding 5000 dpm/100cm<sup>2</sup> beta-gamma shall be controlled as radioactive material.

Contrary to the above, written procedures were not implemented in that:

1. On October 1, 1996, during the performance of procedure 30AC-OPS-001-0S, a plant operator repositioned a component not on the clearance. This caused the operating Unit 1 Control Rod Drive Pump Motor to trip, resulting in a temporary loss of normal rod drive motive force, seal water to the reactor recirculating pumps, and water supply to the reactor level reference leg keep-fill system.
2. On October 10, 1996, during the performance of procedure 51GM-MNT-017-0S, the inspectors observed an unmarked container being used to add lubricant to the Unit 2 Reactor Core Isolation Cooling Pump. Also, there were several additional unmarked containers on the room floor containing oil residue.

3. On or about April 12, 1996, radioactive materials with fixed surface contamination levels exceeding 5000 dpm/100cm<sup>2</sup> were removed from a radiologically controlled area and not controlled as radioactive material as required by 60AC-HPX-007-0S.

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

#### RESPONSE TO VIOLATION 96-13-03

##### Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

##### Reason for the violation:

The first example of the Notice of Violation was caused by personnel error. The Plant Equipment Operator (PEO) performing a clearance for the 1A Control Rod Drive pump incorrectly opened the control power breaker for the 1B Control Rod Drive pump instead of the 1A pump as required by the clearance. The PEO failed to perform proper self-checking prior to opening the control power breaker.

The second example of the Notice of Violation was caused by personnel error. Maintenance personnel transferred oil from labeled five-gallon containers to (unlabeled) one-gallon containers for convenience in transporting the oil to be added to the Unit 2 Reactor Core Isolation Cooling pump. They failed to label the one-gallon containers as required by plant procedure 51GM-MNT-017-0S, "Control of Lubricants."

The cause of the third example of the Notice of Violation could not be determined conclusively although the most likely cause was miscommunication. An Event Review Team investigated why the contaminated material (cooling coils from the Unit 1 "A" and "B" motor/generator set rooms) was released from the radiologically controlled area as clean material. The "B" cooling coils were checked for and found to be free of loose surface contamination before they were moved from the 158-foot elevation to the 130-foot elevation and out of the Unit 1 Reactor Building. It appears likely the term "no smearable contamination" was interpreted to mean the material was "clean" and could be removed from the Unit 1 Reactor Building. The foreman may have communicated to Health Physics personnel at the exit of the Unit 1 Reactor Building that another Health Physics technician had determined the coils were "clean," and the second technician then released them from the building. Therefore, it was concluded the *most probable cause* for the release of the material was a miscommunication between the foreman in charge of moving the material and Health Physics personnel.

Corrective steps which have been taken and the results achieved:

For the first example, the involved person was disciplined in accordance with Georgia Power Company's Positive Discipline Program.

For the second example, the importance of using lubricants from properly labeled containers was stressed to the maintenance teams during team meetings.

For the third example, Health Physics management issued a new policy for the release of materials from radiologically controlled areas. This policy, which was effective 11/1/96, requires the following:

1. Material must be surveyed in low background areas or with automated monitoring equipment prior to release from radiologically controlled areas.
2. Generally, material must be stored in a designated area until sufficient time and resources can be made available to survey the material for release from radiologically controlled areas. Health Physics superintendent approval is required for material to be surveyed and released immediately.
3. Material which has been surveyed in other than automated monitoring equipment and found to be free of contamination must be tagged if the material is to leave the Protected Area. The technician who surveyed the material must escort the material to the exit point.

Corrective steps which will be taken to avoid further violations:

The requirements for labeling lubricant containers will be re-emphasized during Maintenance tool box meetings to be held in January 1997.

Date when full compliance will be achieved:

For the first example, full compliance was achieved on 10/1/96 when control power was restored to the "1B" Control Rod Drive pump.

For the second example, full compliance was achieved by 10/12/96 when the oil was removed from the Unit 2 Reactor Core Isolation Cooling pump room and the containers labeled.

For the third example, full compliance was achieved on 10/9/96 when the contaminated cooling coils pieces were moved to the Waste Separation and Temporary Storage Facility, a radiologically controlled area.

## Enclosure 2

### Edwin I. Hatch Nuclear Plant Violation 96-13-05 and GPC Response

#### VIOLATION 96-13-05

Unit 2 Technical Specification 3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers, Limiting Conditions for Operations (sic) required that each reactor building-to-suppression chamber vacuum breaker shall be operable. Technical Specification Surveillance Requirement 3.6.1.7.3 stated: Verify the opening setpoint of each vacuum breaker is less than or equal to 0.5 psid.

Unit 2 Bases B 3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers, stated, in part, "The design of the external (reactor building-to-suppression chamber) vacuum relief provision consists of two vacuum breakers (a mechanical vacuum breaker and an air operated butterfly valve), located in series in each of two lines from the reactor building to the suppression chamber air space." The butterfly valve is actuated by differential pressure.

Contrary to the above, since the unit was licensed on June 13, 1978, until September 17, 1996, the licensee failed to verify that the opening setpoints of Reactor Building-to-Suppression Chamber Vacuum Breaker butterfly valves 2T48-F310 and 2T48-F311 were less than 0.5 psid.

This is a Severity Level IV violation (Supplement I). This violation is applicable to Unit 2.

#### RESPONSE TO VIOLATION 96-13-05

##### Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

##### Reason for the violation:

This event was caused by a misinterpretation of Unit 2 Technical Specifications surveillance requirements. Unit 2 Surveillance Requirement 3.6.1.7.3 requires that the opening setpoint of each vacuum breaker be verified to be less than or equal to 0.5 psid. Because the Surveillance Requirement does not specify a channel functional test or logic system functional test be performed, this requirement was incorrectly interpreted to necessitate a check of only a portion of the actuation logic for Reactor Building-to-Suppression Chamber Vacuum Breaker butterfly valves 2T48-F310 and 2T48-F311.

Consequently, a check of the entire actuation logic system was not performed nor was the actual operation of valves 2T48-F310 and 2T48-F311 at the specified setpoint verified.

Butterfly valves 2T48-F310 and 2T48-F311 are air operated valves which actuate on a high differential pressure signal. Differential pressure between the Suppression Chamber atmosphere and the Reactor Building is sensed by differential pressure transmitters 2T48-N310 and 2T48-N311. The transmitters provide input to current-to-voltage (I/V) converters which, in turn, provide input to Foxboro alarm units 2T48-K626A and B. These units function to actuate a relay when the voltage signal indicates that differential pressure exceeds the setpoint of the alarm unit. The relay actuation then results in the opening of valves 2T48-F310 and 2T48-F311. Due to the aforementioned misinterpretation of the surveillance requirements, it was thought only the setpoint at which the alarm units actuated was required to be checked. Therefore, proper operation of the remaining logic system components was not checked nor was actual opening of the butterfly valves verified.

This event was identified as a potential missed surveillance by Plant Hatch Operations department personnel on 9/17/96 during a review of surveillance task sheets. A deficiency card was generated promptly and the required surveillance completed on 9/17/96.

Corrective steps which have been taken and the results achieved:

New surveillance test procedure 57SV-T48-011-2S, "Reactor Building to Pressure Suppression Chamber Vacuum Relief System FT&C," was written to test the entire actuation logic system and to verify the air operated butterfly valves open at the specified setpoint. The procedure was performed successfully on 9/17/96.

Corrective steps which will be taken to avoid further violations:

No additional corrective actions are necessary to avoid further violations.

Date when full compliance will be achieved:

Full compliance was achieved on 9/17/96 when surveillance procedure 57SV-T48-011-2S was performed successfully.