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Georgia Power
Southern electric system

NED-85-718
2170N

September 30, 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
I&E Inspection Report
83-15

ATTENTION: Dr. J. Nelson Grace

Gentlemen:

NRC I&E Inspection Reports 50-321/83-15 and 50-366/83-15 transmitted by NRC letter dated June 17, 1983, cited Georgia Power Company (GPC) with a Severity Level IV violation as a result of several locked-open valves (including a fire protection valve) having been observed to be unlocked. While the affected valves were in their proper position, they were found unlocked such that valve operation would not have been prevented. The violation applied only to Hatch Unit 1 and was a repeat violation.

GPC responded to the violation by letter dated July 12, 1983, and acknowledged the need for increased administrative controls due to the recurrent nature of the aforementioned event. It was indicated that a program was being developed which would strengthen the controls for logging and tracking changes in locked valve positions. Further, the program would require independent verification of locked position of safety-related valves. Fire protection and instrument valves were to be placed under a similar administrative controls program.

The proposed program for control of locked valves is currently in place except that the administrative controls for the fire protection valves are now being handled under a surveillance procedure in lieu of the administrative procedure in which they were initially included following issuance of our July 12, 1983, letter. The purpose of this letter is to advise NRC of this change in the administrative controls for these valves and the reasons therefor.

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The administrative program procedure "Control Of Locked Valves" (formerly plant administrative procedure no. HNP-514) had in its early development and implementation a list of locked fire protection valves. However, after June 29, 1984, the procedure was revised to delete fire protection valves from this program. The reason for the deletion was that the fire protection surveillance procedure "Fire Protection Isolation Valves Position and Lubrication Checks" (formerly plant surveillance procedure nos. HNP-1-3358 and HNP-2-3358 for Hatch Units 1 and 2, respectively) provided a monthly surveillance check. The aforementioned fire protection surveillance procedure is performed monthly to meet fire code requirements and in so doing is performed on a more frequent basis than locked-valve surveillance under the administrative program procedure. In addition, the fire protection surveillance procedure has been revised to require independent verification of the locked position of the subject valves. Although the current surveillance practice for locked fire protection valves differs from our commitment in the July 12, 1983, letter, GPC is confident that the current practice using the aforementioned fire protection surveillance procedure provides at least an equivalent degree of assurance that the fire protection valves are in their proper position and locked. In addition, if a fire protection system is isolated due to maintenance, the system is secured as required by the plant administrative procedure "Equipment Clearance & Tagging" (formerly plant administrative procedure no. HNP-501). Also, all other plant procedures which require the manipulation of a fire protection valve, restore the valve to its original locked position.

Unless NRC indicates otherwise, GPC will continue with the current fire protection valve surveillance practice discussed herein.

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

Sincerely yours,



L. T. Gucwa

JAE/mb

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