

NOTICE OF VIOLATION

Georgia Power Company
Hatch Units 1 and 2

Docket Nos. 50-321, 50-366
License Nos. DPR-57, NPF-5

During the NRC inspection conducted on December 8, 1996 through January 18, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG 1600, the violations are listed below:

- A. 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.d, recommends procedures for Procedure Adherence.

Procedure 10AC-MGR-019-0S, Procedure Use and Adherence, Revision 0, Step 8.1, states, in part, that the user must review the procedure prior to use, follow steps in sequence unless otherwise allowed, and complete documentation as required.

Procedure 51GM-MNT-034-0S, MOV Electrical Backseating With Instantaneous Circuit Breaker Trip Protection, Revision 2, step 4.3.2, stated, in part, that prior to performing backseating, the Shift Supervisor on duty will review the engineering evaluation for the impact on stroke time requirements and will indicate the results of that review in the work performed section of the Maintenance Work Order. Step 4.3.5 states, in part, that a Maintenance Work Order must be initiated for internal inspection on the valve to be backseated.

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

On December 27, 1996, during the performance of procedure 51GM-MNT-034-0S for electrically backseating a Reactor Core Isolation Cooling Inboard Steam Isolation valve, 1E51-F007, a review of the engineering evaluation for impact on stroke time requirements was not documented in the work performed section of a Maintenance Work Order, as required by Step 4.3.2 of the procedure. Also, a Maintenance Work Order was not initiated and documented for an internal valve inspection on the backseated valve, as required by step 4.3.5 of the procedure.

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

- B. TS 5.4 requires that written procedures be established, implemented, and maintained covering activities delineated in

Enclosure 1

Appendix A of Regulatory Guide (RG) 1.33, Revision. 2, dated February 1978.

RG 1.33, Appendix A, Typical Procedures for Pressurized Water Reactor and Boiling Water Reactors, Paragraph 7.e, requires radiation protection procedures for the Radiation Work Permit System, for Contamination Control, and for Bioassay Programs.

Health Physics procedure 60AC-HPX-004-0S, Radiation and Contamination Control, Revision (Rev.) 14, specifies that HP will initiate controls, e.g., engineering controls, to ensure that the spread of contamination is minimized; will perform non-routine radiation and contamination surveys, as required, to support operations and maintenance; will perform airborne surveys during radioactive work which is expected to cause airborne radioactivity, unless constant air monitors are provided; and perform periodic air sampling to evaluate the effectiveness of filtered ventilation used to control airborne radioactivity.

Administrative control procedure 10AC-MGR-004-0S, Deficiency Control System, Rev. 10, requires, in part, a Deficiency Card to be issued for a procedural inadequacy.

Contrary to the above, the following examples of failure to implement procedures for radiation control activities were identified.

1. For demolition activities conducted in the Unit 1 RadWaste 132 foot elevation on January 15, 1997, engineering controls did not minimize the spread of potentially contaminated materials and adequate contamination and airborne surveys were not performed to evaluate the hazards present.
2. As of January 13, 1997, the licensee failed to issue a deficiency card for Whole Body Counting calibration procedural inadequacies identified from the 1996 third quarter crosscheck in vivo analyses conducted April 1996.

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

Pursuant to the provisions of 10 CFR 2.201, Georgia Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, Hatch Nuclear Plant, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results

Enclosure 1

achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Atlanta, Georgia
this 13th day of February 1997