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Georgia Power

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Manager Nuclear Engineering  
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NED-85-598  
2005N

August 23, 1985

U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region II - Suite 2900  
101 Marietta Street, NW  
Atlanta, Georgia 30323

REFERENCE:  
RII: RDW  
50-366  
Inspection Report  
85-18

ATTENTION: Dr. J. Nelson Grace

Gentlemen:

Georgia Power Company (GPC) submits the following response to NRC Inspection Report 50-366/85-18, dated July 22, 1985 concerning the inspection period of May 24 - June 28, 1985 for Plant Hatch Unit 2. One apparent violation was identified.

VIOLATION:

Technical Specification 6.8.1 requires that procedures shall be established, implemented and maintained covering safety-related activities.

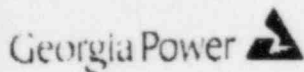
Contrary to the above, Procedure HNP-2-1500, Primary Containment Atmospheric Control System, was not properly implemented in that on May 24, 1985, two nitrogen makeup valves were found out of the position required by Data Package 1 of HNP-2-1500. The position of these valves, being shut instead of open, caused a SCRAM when the air was secured to the Main Steam Isolation valves in preparation for inerting the drywell.

This is a severity Level IV violation (Supplement 1).

RESPONSE:

Admission or denial of alleged violation: The violation occurred. However, such conditions do not constitute a severity Level IV violation in that the conditions had only a minor safety or environmental significance. Furthermore, no deliberate action by GPC personnel led to the conditions which caused the violation. Consequently, HNP-2-1500 was not complied with only to the extent of the mispositioned valves, since the procedure was in fact properly performed.

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Reason for Violation: The motor operated nitrogen makeup valves, 2T48-F026 and F027, were found improperly positioned. Investigation of circumstances leading to the incident provided no conclusive explanation for the misalignment of the nitrogen makeup valves. Refilling of the Unit 2 Nitrogen storage tank and the performance of Logic System Functional Tests (LSFTs) for this system were performed around the same time as completion of HNP-2-1500. Review of data developed in implementing HNP-2-1500 indicates compliance of GPC actions with this document.

Corrective Steps Which Have Been Taken and the Results Achieved: The nitrogen makeup valves, 2T48-F026 and F027, were properly positioned on May 24, 1985. An extensive investigation was undertaken to determine the precise cause for the mispositioned valves. Data Package 1 of HNP-2-1500 was verified to be satisfactorily completed on May 16, 1985 by two very competent licensed operators using independent verification. Additionally, the valves within Data Package 1 of HNP-2-1500 were reverified to be in the proper position on May 24. No other valves were found to be out of the expected position. No Maintenance Work Orders (MWOs) or valve clearances were found requiring these valves to be closed. No entries were found in the Operations or Shift Supervisor's logs concerning these two valves. Personnel interviews and a review of the available data did not provide conclusive evidence that the other activities performed on this system, as described above in the "Reason for Violation", had affected the position of those valves. Additionally, no factual basis could be established that would support the premise that the interruption of plant operation had been a deliberate act by plant personnel or a third party. Site management issued letters to plant personnel describing the incident, requesting further information concerning the incident, and stating plant policy on valve control and manipulation. No further information was received. Also, the valve control switches in the main control room were relabeled to emphasize the effect of shutting valves 2T48-F026 and F027 on the pneumatics for the Main Steam Isolation Valves.

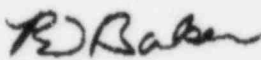
Corrective Steps Which Will Be Taken to Avoid Further Violations: Procedures 3450-P70-001-1 and 2 (HNP-1, 2-1500) and 3450-T48-004-1 and 2, Drywell Pneumatic System will be revised by October 4, 1985 to clarify the permissible methods for shifting of the drywell pneumatic supply by establishing a proceduralized set of instructions for the swapping of the pneumatic medium from nitrogen to plant air and vice versa.

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Date When Full Compliance Was Achieved: Full compliance was achieved on  
May 24, 1985.

Very truly yours,

  
for L. T. Gucwa

CBS/blm

xc: J. T. Beckham, Jr.  
H. C. Nix, Jr.  
J. F. Stolz (NRC-NRR)  
Senior Resident Inspector, Plant Hatch

85 AUG 26 All: 20



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DATE 8-26-85  
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PAGES 3 (excluding cover page)  
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