

Edwin I. Hatch Nuclear Plant



March 5, 1997

Docket No. 50-321  
50-366

HL-5326

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 February 13, 1997, 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 96-15. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Sincerely,

H. L. Sumner, Jr.  
Vice President - Nuclear  
Hatch Project

OCV/eb

Enclosures:

1. Violation 96-15-02 and GPC Response
2. Violation 96-15-05 and GPC Response

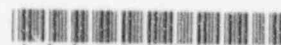
cc: Georgia Power Company

Mr. P. H. Wells, 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. L. A. Reyes, Regional Administrator  
Mr. B. L. Holbrook, Senior Resident Inspector - Hatch

100032



Enclosure 1

Edwin I. Hatch Nuclear Plant  
Violation 96-15-02 and GPC Response

VIOLATION 96-15-02

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-3 GR-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 the 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).

RESPONSE TO VIOLATION 96-15-02

Reason for the violation:

This violation was caused by a less than adequate procedure. Procedure 51GM-MNT-034-0S, "MOV Electrical Backseating With Instantaneous Circuit Breaker Trip Protection," did not contain steps in section 7.0 (the section delineating the actual procedure steps) or require initials to be entered in the attachment documenting work performed to ensure stipulations included in the Special Requirements section of the procedure were met during the performance of valve backseating activities. Consequently, maintenance personnel overlooked the requirement to have the Shift Supervisor review the engineering evaluation and indicate the results of his review in the work performed section of the Maintenance Work Order to backseat valve 1E51-F007.

Maintenance Work Order 1-96-4722, initiated to backseat valve 1E51-F007, contained instructions to repack the valve, inspect the valve actuator, and perform motor operated valve actuator testing following removal from the backseat. These instructions were intended to obtain information from which the engineer or the MOV Coordinator could determine whether an internal inspection was needed. The valve was removed from its backseat and repacked 1/31/97. A motor operated valve actuator test also was performed and, based upon the results of this test, the MOV Coordinator determined on 2/1/97 that no additional valve inspections were required. Therefore, the intent of the requirements contained in step 4.3.5 were met.

Corrective steps which have been taken and the results achieved:

Procedure 51GM-MNT-034-0S was revised to include an additional step in Section 7.0 and sign-off in the procedure attachment to ensure the requirement contained in step 4.3.2 is identified as a work activity which must be completed when a valve is backseated. The requirements of step 4.3.5 also were clarified. This revision was effective 2/21/97.

Corrective steps which will be taken to avoid further violations:

No additional corrective actions to avoid further violations are necessary at this time.

Date when full compliance will be achieved:

Plant Hatch presently is in full compliance with the requirements of procedure 51GM-MNT-034-0S.

Enclosure 2

Edwin I. Hatch Nuclear Plant  
Violation 96-15-05 and GPC Response

VIOLATION 96-15-05

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 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).

RESPONSE TO VIOLATION 96-15-05

Reason for the violation:

This violation was caused by personnel error. In the first example, plant personnel failed to conduct appropriate surveys and correct the spread of potentially contaminated concrete dust beyond the boundaries of the contamination control area. They also failed to correct the engineering controls used to prevent the spread of concrete dust when they were not performing as expected. In the second example, plant personnel failed to initiate a Deficiency Card when they discovered an incorrect value had been used during the whole body counter calibration in April 1996.

Corrective steps which have been taken and the results achieved:

As a result of this violation, the following corrective actions have been taken:

1. Responsible personnel have been made aware of their errors and management expectations as to contamination control measures and Deficiency Card initiation.
2. The first example was discussed, and management expectations regarding contamination control measures were reinforced, with Health Physics technicians.
3. The area outside the contamination control area was decontaminated, the high efficiency particulate air filter was repositioned to improve its ability to control the concrete dust, and a tent was erected to help prevent the spread of dust outside the control area.
4. Deficiency Card CO9700179 was initiated on 1/15/97 to document the error made during the whole body counter calibration. It should be noted that the error was corrected when it was discovered; therefore, the Deficiency Card was written to document the occurrence of the event and the corrective action taken.

Corrective steps which will be taken to avoid further violations:

No additional corrective actions to avoid further violations are necessary at this time.

Date when full compliance will be achieved:

Plant Hatch presently is in full compliance with contamination control requirements on the Unit 1 Radwaste 132-foot elevation.

Full compliance for the second example was achieved on 1/15/97 when a Deficiency Card was initiated to document the error made during the whole body counter calibration in April 1996.