

Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-6526

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

L. T. Gucwa
Manager Nuclear Engineering
and Chief Nuclear Engineer



SL-185
2465N

JAN 21 P 3:14

January 13, 1986

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

REFERENCE:
RII: RDW
50-321
Inspection Report
85-32

ATTENTION: Dr. J. Nelson Grace

Gentlemen:

The following information is submitted in response to Inspection Report 85-32, which concerns the inspection conducted by Messrs. P. Holmes-Ray and G. M. Nejfelt of your office from October 12 to November 9, 1985. Two apparent violations were identified.

VIOLATION 1

"10 CFR 50.72(b)(2)(i) requires that a four hour report be made of any event, found while the reactor is shut down, that, had it been found while the reactor was in operation, would have resulted in the nuclear power plant, including its principal safety barriers, being seriously degraded or being in an unanalyzed condition that significantly compromises plant safety.

Contrary to the above, on December 15, 1984, in service inspection (ISI) was being performed in Unit 1 on selected pipe welds using the magnetic particle inspection method. During testing, a linear through wall crack approximately 2-3/4 inches long was discovered in weld 1T48-2CPI-18-PID-6. This weld is located in the 18-inch nitrogen inerting and purge line between penetration X-25 and valve 1T48-F307. This nonisolable crack was an unanalyzed degradation of a safety barrier (containment) required to be reported under 10 CFR 50.72(b)(2)(i). No four hour report was made.

This is a Severity Level V violation (Supplement I)."

8601290060 860113
PDR ADDOCK 05000321
PDR

1/0

IE01

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
January 13, 1986
Page Two

RESPONSE TO VIOLATION 1

It has been, and continues to be, Georgia Power Company's policy to conservatively report those events which are potentially reportable. In this instance, LER 50-321/1984-025 Rev. 1 reported the event as potential loss of containment function or integrity. We will continue to stress the importance of accurate but conservative reporting of events such as this in the future.

With regard to the notice of violation, after careful review we have concluded that the alleged violation did not occur. When notified of the crack in the 18-inch purge and vent line, the Shift Supervisor judged that the tight, 2-3/4 inch long crack did not significantly compromise plant safety, nor did it significantly degrade the primary containment boundary. The judgement of the Shift Supervisor was verified by subsequent analyses, which were presented to the NRC in a meeting on November 8, 1985. It was demonstrated in that meeting that a catastrophic failure of the cracked weld, as implied in the LER, was not considered possible within the bounds of primary containment design pressure. Further, had a design basis accident occurred with the crack present, radiation doses at the site boundary resulting from leakage through the crack combined with assumed FSAR leakage would not have exceeded 10 CFR Part 100.11 limits. Since the crack did not seriously degrade a principal safety barrier, nor did it result in an unanalyzed condition significantly compromising plant safety, a four hour report pursuant to 10 CFR 50.72(b)(2)(i) was not required.

VIOLATION 2

"Technical Specification 6.8.1.a requires that written procedures be established, implemented, and maintained covering the main steam system as referenced in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.

Contrary to the above, procedure HNP-1907, concerning the failure of main steam safety/relief valves to operate, failed to reflect safety relief valve power supply fuse locations made by Design Change Request 81-138, Revision 1.

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

RESPONSE TO VIOLATION 2

Admission or denial of alleged violation: The violation occurred.

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
January 13, 1986
Page Three

RESPONSE TO VIOLATION 2: (Continued)

Reason for the violation: The failure to revise procedure HNP-1-1907, "Failure of Safety/Relief Valves to Operate", was due to inadequate programmatic controls on the Design Change Request (DCR) process. Controls to ensure that plant procedures were revised to reflect design changes prior to returning the system to service were not adequate.

Corrective steps which have been taken and the results achieved: Procedure HNP-1-1907 has been revised to reflect the new S/RV fuse locations resulting from the implementation of DCR 81-138, Revision 1. Procedure 34AB-OPS-007-1 has since replaced HNP-1-1907. The S/RV fuses were labeled and a Test or Experiment Request (TER) performed to verify that the labels were correct. All procedures affected by the ATTS modification, of which DCR 81-138, Rev 1 was a part, were reviewed to ensure that they accurately reflect the modifications (approximately 228 procedures were reviewed). Several minor discrepancies were discovered resulting in subsequent procedure revisions.

Corrective steps which will be taken to avoid further violations: The procedure for controlling the design change process, 42EN-ENG-01-0, has been upgraded to include steps for ensuring that plant procedures are accurately revised prior to returning the modified system to service. The upgraded procedure requires that the engineer implementing the DCR be responsible for ensuring that the necessary procedure revisions are made.

Date when full compliance was achieved: Full compliance was achieved on May 16, 1985, when procedure HNP-1-1907 was revised to reflect the correct S/RV fuse locations.

Please contact this office if you have any questions.

Very truly yours,

L T Gucwa
L. T. Gucwa 

JHartka/mb

xc: Mr. J. T. Beckham, Jr.
Mr. H. C. Nix, Jr.
Dr. J. N. Grace (NRC-Region II)
Senior Resident Inspector
GO-NORMS