



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

MAR 10 1988

Docket Nos. 50-321, 50-366

Georgia Power Company
ATTN: George S. Head
Senior Vice President
P. O. Box 4545
Atlanta, GA 30302

Gentlemen:

SUBJECT: QUALITY VERIFICATION FUNCTION INSPECTION AT E. I. HATCH
NRC INSPECTION REPORT NOS. 50-321/87-31 AND 50-366/87-31

Enclosed is the report of the special, announced NRC team inspection conducted at Edwin I. Hatch Nuclear Power Plant from November 30 through December 11, 1987, of activities authorized by NRC License Nos. DPR-57 and NPF-5. The inspection team consisted of K. Hooks, J. Heller, K. Jury, G. Pick, W. Scott, and M. Shannon of the NRC. The inspection team's findings were discussed with J. T. Beckham, H. C. Nix, and other members of your staff at the conclusion of the inspection.

The inspection was the fifth in a series of NRC Headquarters-directed Quality Verification Function Inspections (QVFI) performed under the guidance of Temporary Instruction (TI) 2515/78. The inspection focused on the effectiveness of your quality verification organizations in identifying, resolving, and preventing safety-significant technical deficiencies. The inspection also evaluated the effectiveness of your management in ensuring that identified quality deficiencies were responded to promptly and completely.

Our review indicates that the Hatch quality verification organization's performance has been generally effective in the operations and plant modifications areas. The staff involved in these areas are experienced individuals who are capable of conducting in-depth technical verifications. The audits, surveillances, and observations conducted in these areas are performance-oriented and have resulted in the identification of significant issues that impact plant reliability and safety. Additionally, management appears to be effective in ensuring that deficiencies are addressed promptly and completely.

Although the Hatch quality verification organizations were found to be generally effective, the NRC inspection team identified six Observations and three Potential Enforcement Findings (PEFs); these are described in the Inspection Report. The PEFs are associated with Design Change Request (DCR) 85-007, and relate to failure to identify a Technical Specification violation associated with reactor water clean-up (RWCU) system primary containment isolation valves, inadequate post-maintenance/modification testing of the RWCU system, and failure to properly identify the bases for the determination

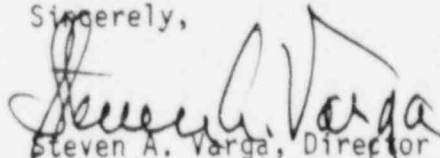
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that a change did not involve an unreviewed safety question. The details of these PEFs are given in Enclosure 1; these apparent violations of regulatory requirements will be further evaluated by NRC Region II management for possible enforcement action. Inspection Report Nos. 50-321/87-31 and 50-366/87-31 is in Enclosure 2. The NRC recognizes that DCR 85-007 was initiated in January 1985, and the deficiencies identified are not necessarily representative of the present organization at Hatch Nuclear Plant.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC Public Document Room. No reply to this letter is required at this time.

Should you have any questions regarding this inspection, please contact us or the NRC Region II Office.

Sincerely,



Steven A. Varga, Director
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Potential Enforcement Findings
2. Inspection Report Nos. 50-321/87-31
and 50-366/87-31

cc w/encls:

- J. T. Beckham, Vice President, Plant Hatch
- H. C. Nix, Manager, Plant Hatch
- O. M. Fraser, Manager, Site Quality Assurance
- L. T. Gucwa, Manager, Nuclear Safety and Licensing

ENCLOSURE 1

POTENTIAL ENFORCEMENT FINDINGS

As a result of the NRC Quality Verification Function Inspection at Hatch Nuclear Plant from November 30 through December 11, 1987, the following items listed below are being referred to Region II as Potential Enforcement Findings. Section references given refer to the detailed descriptions in the Inspection Report.

1. Criterion XI of 10 CFR 50, Appendix B requires, in part, that the licensee identify and perform all testing required to demonstrate that systems will perform satisfactorily in service. ANSI 18.7, Section 5.2.7 states that a suitable level of confidence in structures, systems, or components on which maintenance or modifications have been performed should be obtained by appropriate inspection and performance testing.
 - a. Contrary to these requirements, the NRC inspectors found that the post-maintenance testing of the reactor water clean-up (RWCU) system performed after the corrective action of Licensee Event Report (LER) 84-029 did not verify that both RWCU isolation valves would close as required on a high differential flow signal (Section 3.4).
 - b. Also contrary to these requirements, the NRC inspectors found that the post-modification testing performed under Maintenance Work Order (MWO) 9-85-401 did not test the installation of the 45-second time delay relay (Section 3.4).
2. 10 CFR 50.59(b)(1) requires that a licensee initiate a written safety evaluation that provides adequate bases for the determination that a change to the facility does not involve an unreviewed safety question.

Contrary to this requirement, the safety evaluation for Design Change Request 85-007, Revision 1, did not adequately detail the bases for the determination that the change was not an unreviewed safety question (Section 3.4).
3. The Hatch Unit 2 Technical Specifications--Sections 3.6.3, "Primary Containment Isolation Valves," and 3.3.2, "Isolation Actuation Instrumentation"--require that the reactor water clean-up (RWCU) isolation valves be operable with an instrument response time of less than or equal to 13 seconds and a subsequent valve closure time of less than or equal to 30 seconds.

Contrary to this requirement, the RWCU isolation valve response time exceeded 13 seconds because the licensee installed a 45-second delay timer in the instrument loop (Section 3.4).

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