

## NOTICE OF VIOLATION

Southern Nuclear Operating Company  
Hatch Units 1 and 2

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

During the NRC inspection conducted on February 23, 1997 through April 5, 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. Technical Specification (TS) 5.4 requires, in part that written procedures shall be established, implemented, and maintained covering the activities in the applicable procedures recommended in Regulatory Guide (RG) 1.33, Revision 2, Appendix A, February 1978, Appendix A: Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors, of the RG, paragraph 1. Administrative Procedures, recommends procedures for Equipment Control (e.g., locking and tagging), paragraph 9, recommends procedures for performing maintenance and modifications.

Administrative Control Procedure 30AC-OPS-001-0S, "Control of Equipment Clearance and Tags," Revision 15, sections 8.12, Temporary Releases, and 8.13, Releasing Clearances, Subclearances, and Components, requires, in part, that the sequence in which a clearance is removed and restored must be specified. Implicit in this instruction is that the sequence be correct to prevent unwanted Engineered Safety Feature Actuations. Sections 4.2.2, 4.7.1, and 8.8.3 of the procedure specify the responsibilities of personnel and indicates that no work is to be performed prior to establishing an approved clearance.

Procedure 17MS-MMS-002-0S, "DCR Process," Revision 1, section 7.4.1, requires, in part, that prior to issuing Maintenance Work Orders (MWOs), the responsible Design Control Request Implementer was to ensure Special Design Considerations were identified on MWOs and Work Process Sheets (WPS).

Procedure 50AC-MNT-001-0S, "Maintenance Program," Revision 24, section 4.9, requires, in part, that Plant Maintenance and Modification (PMMS) personnel were responsible to ensure that a Fire Protection Evaluation is completed prior to scheduling work on equipment serving or impacting Fire Protection.

Procedure 40AC-ENG-003-0S, "Design Control," Revision 8, step 8.2.2.8, requires, in part, that design packages approved for implementation will be field installed in accordance with procedure 50AC-MNT-001-0S, "Maintenance Program."

Procedure 50AC-MNT-001-0S, "Maintenance Program," Revision 24, step 4.2.5, requires, in part, that maintenance activities are performed and controlled within the boundaries of "Work Instructions" of MWOs and/or Procedures....

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

1. On April 2, 1997, Sections 8.12 and 8.13 of procedure 30AC-OPS-001-OS were not correctly implemented. As a result, a clearance was restored in an incorrect sequence and resulted in an unplanned engineering safety features actuation for an inadvertent start of the 1B Emergency Diesel Generator.
2. On March 19, 1997, sections 4.2.2, 4.7.1, and 8.8.3 of procedure 30AC-OPS-001-OS were not correctly implemented. Craftsman removed the electrical motor driven actuator from valve 1P41-F313D, prior to the placement of electrical maintenance sub clearance 2-97-188. This resulted in maintenance activities being conducted on the valve actuator prior to an approved clearance being established.
3. On or before March 14, 1997, section 7.4.1 of procedure 17MS-MMS-002-OS and section 4.9 of procedure 50AC-MNT-001-OS were not correctly implemented. Maintenance Work Orders and Work Process Sheets were used for ongoing work activities associated with Design Control Request 94-047, absent Special Design Consideration instructions. The work instructions did not identify that restoration of the bolt holes was required to maintain the integrity of fire barriers. Specifically, bolt holes associated with the fire protection piping in the Unit 2 East Direct Current switchgear room, various control building walls, transformer room 2C/D, and the Unit 2 West Direct Current switchgear room were not correctly restored. This resulted in degraded fire barriers without the required compensatory actions being established.
4. On March 11, 1997, step 8.2.2.8 of procedure 40AC-ENG-003-OS and step 4.2.5 of procedure 50AC-MNT-001-OS were not correctly implemented. Craftsman performed work outside the work instructions while implementing Design Control Request 94-050, to install vent piping on the Unit 2 Reactor Building Chiller B. As a result the inservice chiller was rendered inoperable.

This is a Severity Level IV Violation (Supplement I) (Unit 2).

- B. 10 CFR 50.72 (b)(2)(ii). Four-hour reports, states in part that, the licensee shall notify the NRC as soon as practical and in all cases, within four hours of...any event or condition that results in a manual or automatic actuation of any engineered safety feature....

Contrary to the above, a four-hour reporting requirement was not met on March 25, 1997. During maintenance work activities to replace a bad relay coil on Unit 2, a technician accidentally grounded a jumper causing a partial Group 2 Engineered Safety Feature actuation for Containment Isolation, at 12:06 p.m. The required four hour NRC report was not made until 5:47 p.m.

This is a Severity Level IV Violation (Supplement I) (Unit 2).

- C. 10 CFR 50, Appendix B, Criterion IV, requires that measures shall be established to assure that applicable regulatory requirements, design bases, and other requirements which are necessary to assure adequate quality are suitably included or referenced in the documents for procurement of equipment.

The above requirement as implemented by the Edwin I. Hatch Nuclear Plant Quality Assurance Manual, section 4, Procurement Document Control, requires in part, that the Hatch Project shall establish measures to assure that applicable regulatory requirements, design bases, and other requirements necessary to assure adequate quality are suitably included or referenced in the documents for procurement of equipment.

Contrary to the above, as of March 26, 1997, measures did not assure that applicable regulatory requirements, design bases, and other requirements which are necessary to assure adequate quality were suitably included or referenced in the documents for procurement of equipment, in that, Change Requests 18 and 19 to Blanket Purchase Order Number 6012598, for Units 1 and 2 Power Range Neutron Monitoring Parts, failed to include or reference design requirements.

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

Pursuant to the provisions of 10 CFR 2.201, Southern Nuclear Operating 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

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for disputing the violation, (2) the corrective steps that have been taken and the results 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 5th day of May 1997