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Docket Nos.: 50-366

NL-20-0669

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001

Edwin I. Hatch Nuclear Plant Unit 2
Licensee Event Report 2020-002-00
HPCI and RCIC Inoperable When Required by Technical Specifications

Ladies and Gentlemen:

In accordance with the requirements of 10 CFR 50.73(a)(2)(v)(D) and 10 CFR 50.73(a)(2)(i)(B), Southern Nuclear Operating Company hereby submits the enclosed Licensee Event Report.

This letter contains no NRC commitments. If you have any questions, please contact the Hatch Licensing Manager, Jimmy Collins at 912.453.2342.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Edwin D. Dean III", written over a horizontal line.

Edwin D. Dean III
Vice President – Hatch

SD/PDF/SCM

Enclosure: LER 2020-002-00

cc: Regional Administrator, Region II
NRR Project Manager – Hatch
Senior Resident Inspector – Hatch
RTYPE: CHA02.004

Edwin I. Hatch Nuclear Plant Unit 2

Licensee Event Report 2020-002-00

HPCI and RCIC Inoperable When Required by Technical Specifications

**LICENSEE EVENT REPORT (LER)**

(See Page 2 for required number of digits/characters for each block)

(See NUREG-1022, R.3 for instruction and guidance for completing this form
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/>)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Information Services Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to infocollcts.Resource@nrc.gov, and the OMB reviewer at: OMB Office of Information and Regulatory Affairs, (3150-0104), Attn: Desk Officer for the Nuclear Regulatory Commission, 725 17th Street NW, Washington, DC 20503; e-mail: omb_submission@omb.eop.gov. The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays a currently valid OMB control number.

1. Facility Name Edwin I. Hatch Nuclear Plant Unit 2	2. Docket Number 05000 366	3. Page 1 OF 2
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4. Title HPCI and RCIC Inoperable When Required by Technical Specifications

5. Event Date			6. LER Number			7. Report Date			8. Other Facilities Involved	
Month	Day	Year	Year	Sequential Number	Rev No.	Month	Day	Year	Facility Name	Docket Number
4	22	2020	2020	- 002 - 00		06	18	2020	Facility Name	Docket Number 05000

9. Operating Mode 2	11. This Report is Submitted Pursuant to the Requirements of 10 CFR §: (Check all that apply)			
	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)
10. Power Level 0.4	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> 73.77(a)(1)
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input checked="" type="checkbox"/> 50.73(a)(2)(v)(D)	<input type="checkbox"/> 73.77(a)(2)(i)
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> 73.77(a)(2)(ii)
		<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> Other (Specify in Abstract below or in NRC Form 366A)	

12. Licensee Contact for this LER

Licensee Contact Edwin I. Hatch/ Jimmy Collins – Licensing Manger	Telephone Number (Include Area Code) 912-453-2342
-----------------------------------------------------------------------------	-------------------------------------------------------------

13. Complete One Line for each Component Failure Described in this Report									
Cause	System	Component	Manufacturer	Reportable to ICES	Cause	System	Component	Manufacturer	Reportable to ICES
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

14. Supplemental Report Expected					15. Expected Submission Date				
<input type="checkbox"/> Yes (If yes, complete 15. Expected Submission Date) <input checked="" type="checkbox"/> No									

Abstract (Limit to 1400 spaces, i.e., approximately 14 single-spaced typewritten lines)

At 1015 EST, on 04/22/2020, while Unit 2 was at approximately 0.4 percent power in MODE 2, reactor steam dome pressure reached and subsequently exceeded 150 psig while High Pressure Coolant Injection (HPCI) and Reactor Core Isolation Cooling (RCIC) were inoperable due to not being placed in standby. Technical Specification (TS) Limiting Conditions of Operation (LCO) 3.5.1 and 3.5.3 are applicable in Mode 2, when Reactor steam dome pressure is greater than 150 psig. TS LCO 3.5.1, Conditions C and E were entered. TS LCO 3.5.3 Conditions A and B were also entered. HPCI does not have a redundant system; therefore, this condition is being reported per 10 CFR 50.73(a)(2)(v)(D) as an event that could have prevented fulfillment of a safety function. Contrary to the requirements of LCO 3.0.4, LCO 3.5.1 and LCO 3.5.3 were not met before entering the mode of applicability. Therefore, this event is also being reported under 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by technical specifications. The Automatic Depressurization System and the Low Pressure Emergency Core Cooling system were OPERABLE during this time. HPCI was returned to OPERABLE status at 1109 EST on 04/22/2020. RCIC was returned to operable status at 1143 EST on 04/22/2020. This event was caused a by human performance error. There was no impact on the health and safety of the public or plant personnel.

**LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET**

(See NUREG-1022, R.3 for instruction and guidance for completing this form
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/>)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Information Services Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and the OMB reviewer at: OMB Office of Information and Regulatory Affairs, (3150-0104), Attn: Desk Officer for the Nuclear Regulatory Commission, 725 17th Street NW, Washington, DC 20503; e-mail: omb_submission@omb.eop.gov. The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays a currently valid OMB control number.

1. FACILITY NAME		2. DOCKET NUMBER		3. LER NUMBER		
Edwin I. Hatch Nuclear Plant Unit 2		05000-366		YEAR	SEQUENTIAL NUMBER	REV NO.
				2020	002	00

NARRATIVE**EVENT DESCRIPTION:**

On 04/22/2020 at 0600, Unit 2 was in Startup (Mode 2) following a maintenance planned outage. While withdrawing control rods and after reaching the point of adding heat (POAH), the shift team focused on establishing Intermediate Range Monitor (IRM) overlaps. After reaching the POAH, the team continued to withdraw control rods to obtain IRM overlaps and avoid going subcritical as reactor coolant system heat up was adding negative reactivity. Those efforts led to rising moderator temperature. At 1015 EST, on 04/22/2020, while Unit 2 was at approximately 0.4 % power in MODE 2, reactor pressure reached and subsequently exceeded 150 psig while High Pressure Coolant Injection (HPCI) [EIS BJ] and Reactor Core Isolation Cooling (RCIC) [EIS BN] were inoperable due to not being placed in standby. Technical Specification (TS) Limiting Condition of Operation (LCO) 3.5.1 and 3.5.3 are applicable in Mode 2, when pressure is greater than 150 psig.

EVENT CAUSE ANALYSIS:

This event was caused by a human performance error. Oversight of crew performance was narrowly focused on specific tasks and as a result did not identify gaps in the crew's preparation and execution of the plant startup procedure.

REPORTABILITY AND SAFETY ASSESSMENT:

HPCI does not have a redundant system; therefore, this condition is being reported as an event or condition that at the time of discovery could have prevented the fulfillment of the safety function per 10 CFR 50.73(a)(2)(v)(D). LCO 3.0.4 states, in part, that "When an LCO is not met, entry into a mode or other specified condition in the Applicability shall only be made..." under three specific circumstances. None of these circumstances were applicable for this event. Therefore, entry into the specified Applicability Conditions of MODE 2 and reactor steam dome pressure greater than 150 psig was not allowed for LCO 3.5.1 and LCO 3.5.3 while HPCI and RCIC were inoperable. Contrary to the requirements of LCO 3.0.4, LCO 3.5.1 and LCO 3.5.3 were not met before entering the mode of applicability. Therefore, this event is also being reported under 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by technical specifications. The Automatic Depressurization System (ADS) and Low Pressure Emergency Core Cooling Systems (ECCS) were OPERABLE during this time. The safety significance of this event is minimal due the short duration that HPCI and RCIC were declared inoperable.

CORRECTIVE ACTIONS:

HPCI and RCIC were declared inoperable. Technical Specification Required Action Statements were entered for LCO 3.5.1 Conditions B (HPCI inoperable), LCO 3.5.1 Condition E (Shutdown actions), LCO 3.5.3 Condition A (RCIC inoperable) and LCO 3.5.3 Condition B (Shutdown actions). HPCI and RCIC were returned to OPERABLE status. A case study will be delivered to the operations department and station leadership focusing on remaining in oversight roles and looking ahead at the broader perspective, assigning clear responsibilities, the proficiency model and responding to changing plant conditions.

PREVIOUS SIMILAR EVENTS:

None