



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET SW SUITE 23T85
ATLANTA, GEORGIA 30303-8931**

September 28, 2001

Southern Nuclear Operating Company, Inc.
ATTN: Mr. H. L. Sumner, Jr.
Vice President - Hatch Project
P. O. Box 1295
Birmingham, AL 35201-1295

**SUBJECT: EDWIN I. HATCH NUCLEAR POWER PLANT - NRC LICENSE RENEWAL
INSPECTION REPORT 50-321/01-10, 50-366/01-10**

Dear Mr. Sumner:

On August 28 - 29, 2001, the NRC conducted an inspection at your Birmingham, Alabama offices regarding your application for license renewal for the Hatch, Units 1 and 2 reactor facilities. The enclosed inspection report presents the results of that inspection. The results of this inspection were discussed on August 29, 2001, with members of your staff in an exit meeting.

This was the last in a series of three inspections conducted to support the review by the NRC Office of Nuclear Reactor Regulation of your license renewal application for the Hatch plant. The purpose of this inspection was to follow up on open issues from the two previous inspections. The inspection methods utilized were to review selected procedures and representative records, and to conduct interviews with your staff regarding the various actions you have taken to respond to the previous open issues.

This inspection concluded that your actions in response to the previous open issues were acceptable. The inspection found that your plans regarding continuation, and in some cases expansion, of existing aging management programs and creation of new aging management programs were consistent with your License Renewal Application. In some cases, the inspectors made comments on your proposed procedures for implementing aging management programs. Your staff agreed to consider the NRC comments during procedure completion.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be available electronically for public inspection in the NRC Public Document Room

SNC

2

or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Charles A. Casto, Director
Division of Reactor Safety

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

Enclosure: NRC Inspection Report 50-321/01-10, 50-366/01-10

cc with enclosure
Mr. D. M. Crowe
Manager, Licensing
Souther Nuclear Operating Company Inc.
P.O. Box 1295
Birmingham, Alabama 35201-1295

Resident Inspector
Plant Hatch
11030 Hatch Parkway N.
Baxley, Georgia 31531

Mr. Charles H. Badger
Office of Planning and Budget
Room 610
270 Washington Street, SW
Atlanta, Georgia 30334

Harold Reheis, Director
Department of Natural Resources
205 Butler Street, S.E., Suite 1252
Atlanta, Georgia 30334

Steven M. Jackson
Senior Engineer-Power Supply
Municipal Electric Authority of Georgia
1470 Riveredge Parkway, N.E.
Atlanta, Georgia 30328-4684

Mr. Douglas J. Walter
Nuclear Energy Institute
1776 I Street NW
Washington, D.C. 20006

Mr. Stan Blanton
Balch and Bingham
P.O. Box 306
Birmingham, AL 35201

Mr. David Lochbaum
Union of Concerned Scientists
1707 H Street, NW
Suite 600
Washington, DC 20006-3919

Alice Coleman
Appling County Library
242 East Parker St.
Baxley, Georgia 31513

Rita Kilpatrick
Georgians for Clean Energy
427 Moreland Ave., Ste 100
Atlanta, GA 30307

Chairman
Appling County Commissioners
County Courthouse
Baxley, Georgia 31531

Mr. J. D. Woodard
Executive Vice President
Southern Nuclear Operating Company, Inc.
P. O. Box 1295
Birmingham, Alabama 35201-1295

Mr. P. W. Wells
General Manager, Edwin I. Hatch Nuclear
Plant
Southern Nuclear Operating Company, Inc.
U.S. Highway 1 North - P.O. Box 2010
Baxley, Georgia 31515

Mr. R. D. Barker
Program Manager
Fossil & Nuclear Operations
Oglethorpe Power Corporation
2100 East Exchange Place
P.O. Box 1349
Tucker, Georgia 30085-1349

Charles A. Patrizia, Esq.
Paul, Hastings, Janofsky & Walker
10th Floor
1299 Pennsylvania Ave
Washington, DC 20004-9500

Mr. Ray Baker
Manager, License Renewal Services
Southern Nuclear Operating Company, Inc.
P.O. Box 1295
Birmingham, Alabama 35201-1295

Mr. C.R. Pierce
Southern Nuclear Operating Company
40 Inverness Center Parkway
P.O. Box 1295
Birmingham, AL 35201-1295

SNC

4

Mary Jane Wilmoth, Esq.
National Whistleblower Legal Defense
and Education Fund
3238 P Street, NW
Washington, DC 20007-2756

Jeffrey Stair
Georgia Public Service Commission
47 Trinity Avenue
Atlanta, GA 30334

The Honorable Cynthia A. McKinney
Attn: Mr. Eric Lausten, Constituent Services
Representative
246 Sycamore St., Suite 110
Decatur, GA 30030

Dusty Gres
Ochopee Regional Library System
610 Jackson St.
Vidalia, GA 30474

SNC

5

cc w/encl:
Electronic Mail Distribution
Distribution w/encls:
C. Grimes, NRR
L. Olshan, NRR
W. Burton, NRR
Resident Inspector - Hatch

*See attached concurrence sheet and **E-Mail concurrence sheets

OFFICE	RII:DRS	RII:DRS	RII:DRP				
SIGNATURE	CROWLEY	JULIAN	CAHILL				
NAME	BCrowley	CJulian	SCahill				
DATE	9/27/2001	9/27/2001	9/27/2001				
E-MAIL	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

OFFICIAL RECORD COPY
Inspection Report .wpd

DOCUMENT NAME: S:\DRS\2001 10 HATCH LRIP

U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket Nos: 50-321, 50-366

License Nos: DPR-57, NPF-5

Report No: 50-321/01-10, 50-366/01-10

Licensee: Southern Nuclear Operating Company, Inc. (SNC)

Facility: E. I. Hatch Nuclear Power Plant, Units 1 & 2

Location: P. O. Box 2010
Baxley, Georgia 31515

Dates: August 28 - 29, 2001

Inspectors: B. Crowley, Reactor Inspector

Approved by: Caudle Julian
Team Leader
Division of Reactor Safety

SUMMARY OF FINDINGS

IR 05000321-01-10, IR 05000366-01-10; 8/28-29/2001; Southern Nuclear Operating Company, E.I. Hatch Nuclear Power Plant, Units 1 & 2. License Renewal Inspection Program.

This inspection of License Renewal activities was performed by two regional office engineering inspectors. The inspection program followed was NRC Manual Chapter 2516 and NRC Inspection Procedure 71002. The purpose of this inspection was to follow up on open issues from the two previous license renewal inspections.

This inspection concluded that the completed actions in response to the previous open issues were acceptable. The inspection found that the applicant's plans regarding future actions were acceptable and future action items were included in an action item tracking system. Appendix A contains a list of pertinent documents reviewed during this inspection and a list of acronyms appearing in this report.

REPORT DETAILS

A. Inspection Scope (71002)

This was the last in a series of three inspections conducted to support the review by the NRC office of Nuclear Reactor Regulation of the license renewal application for the Hatch plant. The purpose of this inspection was to follow up on actions taken by the applicant in response to open issues from the two previous inspections.

B. Inspection Findings

1. Drywell Interior Observations

In October 2000, during the Unit 1 refueling outage, two NRC inspectors from the Team performed walkdown inspections of accessible portions of several plant systems inside the Drywell and other normally restricted areas. The inspectors found that the material condition of the piping and components observed in the Drywell was good. In general, the equipment was clean with no evidence of system leakage. However, a buildup of corrosion was observed on the normally insulated carbon steel Plant Service Water system (PSW) hangers and piping inside the Drywell. Although the Drywell is inerted with nitrogen during plant operation, the piping to the Drywell cooler had been exposed to moisture and oxygen probably introduced during outage periods. The applicant had entered the piping deterioration problem into their corrective action program and issued Condition Report (CR) 9072, and a Maintenance Work Order (MWO) 10003337 for evaluation of these conditions. This is a low pressure system so any leakage would be detected by the operators and would present no significant safety concern. The initial evaluation by the applicant found the piping functional, but it required cleanup and examination.

During this inspection, the inspectors examined the completed CR and MWO to evaluate the applicant's actions. The records reflect that the applicant cleaned the rust from the piping and measured the pipe wall thickness at representative points by ultrasonic measurement techniques. The thinnest reading was 0.228" while nominal thickness was 0.280". The minimum wall thickness that would require corrective action by the applicant's procedures would be 0.193" so the applicant concluded no further action was necessary at this time. The inspectors agreed with that conclusion.

2. Control Rod Drive Hydraulics piping

In addition to the walkdown inspections performed during the October 2000 Unit 1 Cycle 19 outage, in March 2001, the inspectors performed walkdown inspections of accessible portions of the control rod drive and standby liquid control systems for Units 1 and 2. In general, the material condition observed for these systems and components was good with no evidence of system leakage. However, a few feet of the Unit 1 control rod drive system 1-1/2" (drive water pressure control) and 2" (test bypass) piping on the 130 foot elevation of Unit 1 had some

foreign substance (hard black/gray material) on the surface. There was also some evidence of minor corrosion associated with some of the foreign material. The applicant issued Condition Report 2001002003 to investigate this condition and take appropriate corrective action.

During this inspection the inspectors were given a MWO 10100806 which showed that on 4/25/01 workers had removed what appeared to be grout from the piping. The text reflects that the worker inquired of an engineer about some paint on the piping and was told the engineer would "address that later". The inspectors inquired if the paint had yet been removed. After applicant inquiry, the inspectors were told that another CR 2001007115 was being generated to address the paint on the CRD piping. The inspectors found this sufficiently responsive to the issue.

3. Observation of Plant Equipment Outdoors and in the Intake Structure

During the walkdown inspections in February 2001, the inspectors noted a number of components which had varying degrees of corrosion and were not being maintained by the protective coatings program. These included various corroded pipe supports in the intake structure associated with the PSW and RHR Service Water (RHRSW) systems, corroded hold down bolts on the Diesel Generator building Cardox unit and on the Diesel Generator building roof, extremely rusted Diesel Generator exhaust silencers, and Cardox fire suppression piping, valves, and bolting. One silencer, 2A, was significantly corroded and the exhaust pipe associated with the silencer was cracked for approximately 75% of its circumference. The applicant had previously recognized the problem with corroded supports at the intake and had initiated corrective action, however, the other problems on the diesel building roof had not been identified previously.

Regarding the corroded pipe supports in the intake structure, the inspectors were informed that two Design Change Requests (2HO1-013 and 1HO-033) had been generated to repair the supports. The first for large diameter piping is scheduled to be completed in 2001 with the second for smaller support work to follow. The inspectors were informed that the Cardox piping had been repainted. Regarding the exhaust silencers, the inspectors were shown a document entitled "Changes To Corrective Action Plan" number 2001005606 which pertains to the diesel silencers. It contains an engineering analysis letter concluding that the problems do not render the diesels inoperable since the diesel vendor stated the Diesel Generators can operate without the silencers and credible structural failures would not drop enough material into the exhaust to harm the machine. The document states that the 2A silencer will be replaced during the fall 2001 Unit 2 refueling outage. Applicant plans are to sandblast and repaint the other four silencers when work opportunities allow prior to 12/1/02. The inspectors found these work plans acceptable.

4. Pressure Vessel Monitoring and Vessel Internals Program

In NRC Inspection Report (IR) 50-321,366/00-10, the inspectors identified that written programs were needed for the Boiling Water Reactor Vessel and Internals Program and the Reactor Pressure Vessel Monitoring Program. Although these two Aging Management Programs (AMPS) took credit for the Inservice Inspection (ISI) Program and various Boiling Water Reactor Vessel and Internals Project (BWRVIP) inspection activities, there was no overall written implementing program.

During this inspection, the inspectors were shown draft proposed Site Administrative Procedure 40AC-ENG-XXX-0S, Managing Aging In Passive Components During the Renewal Period. Sections 8.1.5 and 8.1.6 of this procedure provide written programmatic requirements for the above two listed AMPS. The applicant expects to issue this procedure by mid-2002. In addition, the applicant provided Revision 3 to Procedure HMMS-WP-44, Procedure for Inservice Inspection And Testing and marked-up copies of Procedures ITS 2-2, Revision 45, Inservice Inspection Plans, and ITS 2-1, Revision 65, ISI Program - Including Relief Requests, which included proposed changes to detail requirements for implementing BWRVIP inspections in the ISI program. The inspectors reviewed the proposed procedure and proposed procedure changes and concluded that they would provide adequate written documentation for the Boiling Water Reactor Vessel and Internals and the Reactor Pressure Vessel Monitoring programs.

5. RHR Heat Exchanger Augmented Inspection Procedure

Relative to Residual Heat Removal (RHR) Heat Exchanger (HX) Augmented Inspection and Testing Program, NRC IR 00-10 identified that the proposed program contained limited detail on acceptance criteria and the proposed site procedure did not indicate any inspector qualification requirements. During the current inspection, the inspectors reviewed changes to the proposed RHR Heat Exchanger Augmented Inspection Procedure, which added personnel qualification requirements. In addition, the inspectors reviewed The LR Commitment Implementation Plan. Under Task 9 of the Plan, after all License Renewal Application (LRA) questions and open items are resolved and the final NRC Safety Evaluation Report (SER) is issued, the applicant plans to finalize site procedures with site personnel, which will include adding more specific acceptance criteria. The inspectors concluded that these actions were responsive to the issues.

6. Plant Service Water and RHR Service Water Chemistry Control Program

Relative to the PSW and RHRSW Chemistry Control Program, the inspectors identified in NRC IR 00-10 that the dead leg flush procedures needed to be added to the applicant's commitment list for License Renewal, or the chlorination procedure needed to clearly outline an acceptable method for RHRSW chlorination. The inspectors reviewed the Hatch License Renewal Project Final Commitment Report and verified that Procedures 34GO-OPS-024-1S and 2S had been added to the report for action item tracking under Licensee Renewal.

7. Plant Service Water and RHR Service Water Inspection Program

As part of this program, the applicant performs regulatory required inservice pressure tests in accordance with ASME Section XI. At a 40 month frequency for the tests, the applicant performs visual inspections of the exterior of exposed piping looking for leakage. In NRC IR 00-10 the inspectors noted that the applicant did not perform a documented above ground walkdown of the extensive buried PSW and RHRSW piping looking for indication of leaks as a part of this test. The applicant indicated that they would consider documenting the walkdown of the nine sections of buried pipe that were approximately 200 yards in length (each piping run) during the test. During this inspection, applicant representatives stated they had concluded such documentation was of little value since the probability of detecting a leak in the underground piping during this infrequent inspection was very low. The inspectors had no further comments on the issue.

8. Passive Component Inspection Activities

In NRC IR 00-10 the inspectors noted that the proposed version of the Passive Component Inspection Activities (PCIA) would inspect buried piping of certain systems, including the PSW and RHRSW, should the ground near the pipe be disturbed by digging. An existing procedure, 52GM-MME-028-0S, External Surface Coating of Underground Metallic Pipe, Revision 2, also performed this activity and invoked the existing PSW and RHRSW testing (42IT-TET-012-XS) procedure for use when pipe is uncovered. In the PCIA section of the LRA, the applicant indicated that an alternate procedure would be utilized. During this inspection applicant representatives stated that the unnecessary procedure reference had been removed from the LRA. The inspectors found those actions acceptable.

9. Condensate Storage Tank (CST) Electrical Isolation

The Hatch plant has an aluminum Unit 1 CST. During Inspection 00-10 the inspector asked the applicant if the tank had electrical isolation between the tank and the connecting piping systems. The isolation would prevent tank material loss due to a galvanic potential differential. The applicant did not immediately know of any electrical isolation insulators nor did they have a PM task to check the insulators. The applicant initiated an engineering work request (RER 2001-48) to investigate the question. During this inspection the inspectors were shown an engineering work tracking document showing that RER 2001-48 was initiated on 4/17/01. The work was not yet complete but by procedure must be completed within six months of the initiation date.

10. Flow Accelerated Corrosion Program

Relative to the Flow Accelerated Corrosion (FAC) Program, NRC IR 00-10 identified errors in Section 3.2 of the LRA. Credit was taken for the FAC Program for aging management of main steam flow nozzles and loss of material in valve bodies. FAC is not applicable for these applications. The inspectors reviewed applicant documentation forwarded to NRR correcting these and other errors in LRA Section 3.2 Tables.

In NRC IR 00-10, the inspectors identified that the FAC program did not clearly define applicant practices relative to small diameter (2" and smaller) piping. During the current inspection, the inspectors reviewed Appendix A, FAC-Susceptible Small-Bore Piping, to the Flow Accelerated Corrosion Program and proposed changes to Plant E. I. Hatch Procedure 42IT-N36-001-0S. Implementation of these changes will adequately describe the applicant's practices for control of FAC in small diameter piping.

11. Galvanic Susceptibility Inspection Program

Relative to the Galvanic Susceptibility Inspection Program, NRC IR 00-10 identified that: (1) Appendix B of the LRA did not list System E21 as credited in Table 3.2.3-3 and (2) examination acceptance criteria were not well defined. During the current inspection, the inspectors reviewed applicant documentation forwarded to NRR correcting errors in LRA Section 3.2 Tables. In addition, the inspectors reviewed the LR Commitment Implementation Plan. Under Task 9 of the Plan, after all LRA questions and open items are resolved and the final NRC SER is issued, the applicant plans to finalize site procedures with site personnel, which will include adding more specific details. The inspectors found these actions responsive to the issues.

12. Treated Water Systems Piping Inspections

Relative to Treated Water Systems Piping Inspections, NRC IR 00-10 identified that: (1) Appendix B of the LRA did not list System E11 as credited in Table 3.2.3-2, (2) procedure could be enhanced in the areas of qualification of visual examiners, (3) procedure scope not including some systems, and (4) the process for selection of samples was not defined. During the current inspection, the inspectors reviewed applicant documentation forwarded to NRR correcting errors in LRA Section 3.2 Tables. In addition, the inspectors reviewed changes to proposed site procedure, "Treated Water Systems Piping Inspection", which added NRC questioned systems to the scope and added qualification requirements for inspection personnel. Relative to the process for sample selection, the applicant provided their LR Commitment Implementation Plan. Under Task 9 of the Plan, after all LRA questions and open items are resolved and the final NRC SER is issued, the applicant plans to finalize the procedure with site personnel, which will include adding more specific requirements. The inspectors found these actions responsive to the issues.

13. Diesel Fuel Oil Storage Tanks

In NRC IR 00-10 the inspectors observed that the fuel lines from the outdoor diesel fuel storage tank to the diesel fire pumps were in poor condition. The lines had external corrosion, were in contact with several different types of metals, and metal impact guards had corroded away in several places. When this was pointed out to the applicant, CR 2001 002374, was initiated to document the problems and correct them. During this inspection applicant representatives stated that work was performed under MWO 10103150 and significant improvement was made in conditions of the lines. Additionally, in response to a previous NRC question, the applicant revised procedure 52PM-R43-007-OS, Diesel Fuel Oil Storage Tank Cleaning, to clearly require periodic inspection of the tank interiors for corrosion. The inspectors concluded that the applicant's actions were responsive to the issue.

14. Cable Pull Boxes

In NRC IR 00-10 the inspectors reviewed existing plant procedure 52PM-Y46-001-ON, Rev. 5 ED 2 "Inground Pullbox and Cable Duct Inspection For Water" and a proposed revision of the same procedure which had been revised to include the commitments of the LRA. The proposed procedure highlighted certain pull boxes to designate that they contain 4kV cables subject to aging management and required that those pull boxes be verified empty of water every quarter. The inspectors noted that the proposed procedure included two additional pull boxes in a table on page 11 which were not included in the existing procedure. The inspectors discussed the reason with applicant representatives who stated that while preparing the proposed procedure, they had recognized there were two additional in-scope pull boxes which were not listed in the existing procedure. The inspectors expressed the view that the existing procedure should be revised soon to list the two additional pull boxes and to mark them on the enclosed yard maps so those pull boxes can be included in the program at the next performance of the existing procedure. During this inspection, the inspectors were shown Revision 6 to the procedure dated 7/10/01 in which the changes were made. The inspectors found these actions acceptable.

15. Periodic Meggering of Cables

In NRC IR 00-10 the inspectors reviewed existing procedure 52IT-MEL-003-OS, Rev.8 ED 1 "High Potential and Megger Testing of Electrical Equipment and Cables" and also a proposed revision to that same procedure. The procedure provides directions for performing Direct Current High Potential (HIPOT), megger, and polarization index testing of plant electrical equipment. The inspectors observed that the proposed procedure did not yet contain the frequency requirements specified in section B.1.16 "Wetted Cable Activities" of Appendix B to the LRA. That section states that RHR, RHRSW, and Core Spray motors and cables will be megger tested every 18 months and PSW motors and cables will be megger tested every 12 months. Applicant representatives stated that not all the newer commitments in Appendix B were yet in the proposed procedures and those testing frequency requirements would be added to the proposed procedure before it is approved.

During the current inspection, this issue was discussed with applicant representatives and the inspectors learned that the procedure had not been revised to include the 12 and 18 month megger test frequency. After further discussions with plant staff it was found that the current practice is to megger every 10 years. Plant staff felt that to megger at the proposed increased frequency would be an expensive and difficult practice and the applicant was considering withdrawing the commitment from the LRA. This matter was being discussed with NRR at the close of this inspection. The applicant stated they would either obtain NRR agreement that the more frequent testing was not necessary or they would revise their procedures to require the more frequent testing.

Furthermore during their review, the applicant found that the current megger test does not test a segment of cable in the intake structure. Applicant representatives stated that the current procedures will be revised to test the entire cable. The inspectors concluded that the applicant actions were responsive to the issues and would resolve them appropriately.

16. Protective Coatings Program

Relative to the Protective Coatings Program, NRC IR 00-10 identified that: (1) Appendix B of the LRA did not list System T52 as credited in Table 3.3.1- 6, (2) existing procedure 42EN-ENG-025-0S was unclear relative to the definition of SL II coatings, and (3) the responsibilities for operability determinations for coating problems were not clear in proposed procedure "Augmented Protective Coatings Surveillance". During the current inspection, the inspectors reviewed applicant documentation forwarded to NRR correcting errors in LRA Section 3.2 Tables. In addition, the inspectors reviewed changes to the proposed site procedure and existing site Procedure 42EN-ENG-025-0S, which clarified the definition of SL II coatings and the responsibilities for operability determinations. The inspectors concluded that the applicant actions were responsive to the issues.

17. Fuel Pool Chemistry

In NRC IR 00-10, the inspectors identified that the Fuel Pool Chemistry Program Procedure 64CH-SAM-022-0S did not apply to the T24 (fuel storage) system. During the current inspection, the inspectors reviewed correspondence documenting that a change to add the T24 System to Procedure 64CH-SAM-022-0S is planned for the next revision to the procedure. The inspectors found these actions responsive to the issues.

18. Primary Containment Leakage Rate Testing Program

In NRC IR 00-10 the inspectors reviewed Procedure 40AC-ENG-021-0S, Primary Containment Leakage Rate Testing, and found that it had a typographical error in Section 8. Section 8.1.1 specified that "Test frequencies shall be determined in accordance with 42N-INS-001-0S". The actual reference should have been 42N-INS-002-0S and the procedure reference error had existed for a long time. During this inspection inspectors were shown a copy of the procedure after the reference was corrected.

19. Excavation Procedure

During inspection 00-10 proposed revised Quality Control Procedure, 45QC-MNT-001-0N, Excavation & Earthwork Quality Control, was reviewed. The inspectors were concerned that when excavations exposed piping or coated structural components, the protective coating personnel should be notified to perform an inspection of the exposed portion for coating integrity. During this inspection the inspectors were shown a revised procedure which included requirements for protective coatings personnel to perform those inspections.

20. Gas Systems Component Inspection

Relative to the Gas Systems Component Inspection, NRC IR 00-10 identified the need for additional procedure details in the areas of: (1) qualification requirements for inspector personnel and (2) responsibility for selection of samples and decisions about inspection results. During the current inspection, the inspectors reviewed changes to the proposed procedure "Gas Systems Component Inspection", which provides details for qualification of inspection personnel. In addition, the inspectors reviewed new proposed Site Administrative Procedure 40AC-ENG-XXX-0S, Managing Aging In Passive Components During the Renewal Period, which assigns the subject responsibilities in Section 8.3.1.2.

21. Fire Protection Activities

During inspection 00-10 inspectors reviewed Appendix A of the LRA against the proposed implementing procedures to attempt to confirm that the LRA commitments had been properly incorporated into the proposed procedures. The inspectors observed that the commitments related to Appendix B of the Fire Hazards Analysis (FHA), however, were not specifically documented in the proposed implementation procedures. Instead, a general reference was made to the FHA. Also, nonmetallic components requiring aging management were not specifically identified in the implementing procedures. Finally, inspection of water suppression system strainers (an enhancement to existing plant procedures) was not captured in the commitment matrix.

During the current inspection these issues were discussed. Applicant representatives stated that their proposed procedures clearly direct the reader to Appendix B of the FHA and so it was not necessary to incorporate the FHA information in the proposed procedures. The inspectors agreed with the applicant's conclusion. The inspectors were shown a commitment tracking matrix entry which now includes nonmetallics (CO2 insulation, penetration seals, and cable tray enclosures) as equipment addressed by the Fire Protection Activities program. The same entry

states that water suppression systems strainer internals will be inspected at least once every two years. The inspectors concluded the applicant actions were responsive to the issues.

22. Associated Boundary Drawings

In the scoping and screening NRC IR 00-09, the inspector noted on associated boundary drawings that several system boundaries ended in the middle of piping runs versus at a component, such as a valve. An example was the 30-inch PSW piping downstream of the turbine building isolation valves. In this case, the applicant explained that the intention was to include the piping up to the seismic support where the piping changes from seismic Class I to Class II. The other boundaries were also intended to be at seismic supports. The applicant's justification was considered reasonable, however, the team questioned how the site personnel would be able to understand where the boundaries were intended to be located. The applicant indicated that they would provide clarifying notes on the boundary drawings.

During the current inspection, samples of the clarifying notes were examined. Adding the notes was considered to be an appropriate action.

23. Fuel Storage System

During the scoping and screening inspection 00-09 applicant supporting documentation for spent fuel identified the existence of bladders, bladder N2 back-up supply, and inflatable seals for the transfer canal expansion joints. There was no mention of these items in the LRA Table 2.4.4-1. Discussions with the applicant suggested that the bladders and the inflatable seals were out of scope based on being short lived. A Screening Evaluation Record was identified for the inflatable seals, but no such documentation was identified for the bladders. During the current inspection the applicant stated that bladders and inflatable seals are different names for the same item. They were found to be in scope but to be short lived items requiring no Aging Management Review. The Inspectors determined this explanation was acceptable.

24. Intake Structure Pilings

NRC IR 00-09 noted for the Intake Structure that applicant documentation did not clearly address two attendant structures. These were the two steel sheet pile cells upstream and downstream of the intake area and two creosote wood walls between the sheet piles and the intake. These structures were shown in drawings H-12192 and H-12193. The applicant indicated that these structures would be evaluated and documented for license renewal scoping and screening. Subsequent to the inspection, the applicant provided the documentation of the evaluation results. The applicant determined that neither of the structures are in scope. After reviewing the applicant's supporting documentation for these items, the inspectors concluded that the applicant conclusion was correct.

25. Fire Protection Scoping Issues

During inspection 00-09 the function of Plant Wide Fire Suppression With Water was reviewed. Inspectors questioned the applicant scoping decision to omit the dedicated fire protection storage tank fill lines and pumps from scope. The applicant pointed out NRC guidance document Appendix A to Branch Technical Position 9.5-1 which states, "Two separate reliable water supplies should be provided. (If tanks are used, 2 100% capacity tanks of 300,000

gallons each, shall be installed. They should be interconnected so that pumps can take suction from either or both.)". The capacity of the 300,000 gallon tanks are sufficient and the FHA, Revision 14B makes no mention of the fill lines or refill pumps. The FHA does require that once per 31 days the water supply volume be verified to be at least the minimum specified, and that during required testing of the system that the combined volume of the tanks may not fall below 450,000 gallons. After review by NRR the NRC found the applicant's explanation acceptable.

NRC IR 00-09 states that in responses to NRC Requests for Additional Information, the applicant initially indicated that the Control Building 112 ft elevation (which incorporates the lube oil storage tank) and Radwaste Building water sprinkler fire suppression systems are not included in the regulatory commitments for safe shutdown, and are therefore out of scope. Further discussion with NRR led to the reconsideration of the scoping decision for the Control Building elevation 112. At the conclusion of the 00-09 inspection, the applicant stated their intention to include the fire suppression system protecting the lube oil storage tank in scope for license renewal. The applicant subsequently concluded that the Radwaste Building fire suppression system is also in scope. The inspectors agreed with that conclusion.

C. Overall Conclusions

With regard to the specific previously identified issues, the Inspectors concluded that actions taken by the applicant were appropriate. For items requiring future actions the applicant's plans are appropriate to accomplish those actions and the actions are included in an applicant action item tracking system.

Exit Meeting Summary

The inspectors presented the inspection results to members of applicant management on August 29, 2001. Proprietary information was reviewed during this inspection and identified as such by the applicant to the inspectors but no proprietary information is included in this report. Applicant management offered no dissenting views to the inspectors' conclusions.

Partial List of Persons Contacted

Applicant

R. Baker, Project Manager, License Renewal Services
W. Lunceford, License Renewal Services Engineer
C. Pierce, Manager, License Renewal Services
P. Wolfinger, Plant Hatch License Renewal Coordinator

APPENDIX A

Partial List of Documents Reviewed

Proposed Site Administrative Procedure 40AC-ENG-XXX-0S, Managing Aging In Passive Components During the Renewal Period

Procedure HMMS-WP-44, Revision 3, Procedure for Inservice Inspection And Testing

Marked-up Procedures ITS 2-2, Revision 45, Inservice Inspection Plans, and ITS 2-1, Revision 65, ISI Program - Including Relief Requests

Proposed "RHR Heat Exchanger Augmented Inspection Procedure"

The LR Commitment Implementation Plan

Hatch License Renewal Project Final Commitment Report

Procedures 34GO-OPS-024-1S, Revision 9 ED 1, Equipment Rotation and Flushing of PSW and RHRSW Piping Deadlegs

Proposed Changes to Plant E. I. Hatch Procedure 42IT-N36-001-0S, Revision 6, Inspection of Plant Steam Piping for Flow Accelerated Corrosion

Proposed Appendix A "FAC-Susceptible Small-Bore Piping" to Hatch Nuclear Plant Flow-Accelerated Corrosion Program

Proposed Procedure "Augmented Protective Coatings Surveillance"

Procedure 42EN-ENG-025-0S, Revision 1, Protective Coating Program

Proposed Procedure "Treated water Systems Piping Inspection"

Proposed Procedure "Gas Systems Component Inspection"

52PM-Y46-001-ON, Rev. 6 "Inground Pullbox and Cable Duct Inspection for Water

Proposed Procedure 52PM-R43-007-OS, Rev. 3 "Diesel Fuel Oil Storage Tank Cleaning"

Proposed procedure 45QC-MNT-001-0N, Rev 2 "Excavation & Earthwork Quality Control,"

List of Acronyms

AMP	Aging Management Program
BWRVIP	Boiling Water Reactor Vessel Internals Project
CR	Condition Report
CRD	Control Rod Drive system
CST	Condensate Storage Tank
FAC	Flow Accelerated Corrosion
FHA	Fire Hazards Analysis
HX	Heat Exchanger
IR	Inspection Report
ISI	Inservice Inspection
LRA	License Renewal Application
MWO	Maintenance Work Order
PSW	Plant Service Water system
RHR	Residual Heat Removal system
RHRSW	RHR Service Water system
SER	Safety Evaluation Report