

APPENDIX A

NOTICE OF VIOLATION

Georgia Power Company
Hatch Nuclear Plant Unit 2

License No. NPF-5

Based on the NRC inspection February 2 through March 7, 1980, certain of your activities were apparently not conducted in full compliance with NRC requirements as indicated below. These items have been categorized as described in correspondence to you dated December 31, 1974.

- A. As required by Technical Specification 3.1.3.7.a.2.b), a control rod which is bypassed in the rod sequence control system is required to be moved to the correct position in the proper sequence in order to continue reactor operation. Technical Specification 6.8 requires that written procedures shall be established and implemented. Hatch nuclear plant procedure HNP-2-9207, Rod Movement Sequences, requires that control rods be moved in the proper sequence.

Contrary to the above, during a reactor startup commencing on January 28, 1980, the reactor was taken to power with control rod 46-43 left fully inserted and bypassed in the rod sequence control system rather than fully withdrawn and control rod 10-47 left at Notch 12 rather than fully withdrawn due to personnel errors.

This is an infraction.

- B. As required by Technical Specification 3.1.3.7.a.2, control rods may be bypassed in the rod sequence control system if the control rod reed switch full-in and/or full-out position indicators are inoperable.

Contrary to the above, on January 28, 1980, control rods 46-43 and 14-43 were bypassed full out with operable reed switch position indicators to facilitate rod selection during a reactor startup. Also on January 29, 1980, all group A 3/4 rods were bypassed with operable reed switch position indicators to restore mispositioned control rod 46-43 to its proper position in order to continue a plant startup.

This is an infraction.

- C. As required by Technical Specification 6.9.1.8.f, any personnel error or procedural inadequacy which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the SAR is required to be reported within 24 hours to the director of the regional office.

Contrary to the above, on January 29, 1980, the existence of an out of sequence rod pattern involving two control rods at approximately 10% power which neither the rod worth minimizer, the rod sequence control system, procedural controls, nor operator alertness prevented, was not reported by the licensee. The above two safety systems impose restrictions on rod patterns to mitigate a rod drop accident.

This is an infraction.

- D. As required by Technical Specification 3.1.4.2.b, once control rod withdrawal has started and thermal power is less than 20% of rated power, control rod movement is not permitted except by scram with the rod sequence control system (RSCS) inoperable.

Contrary to the above, on January 29, 1980, after an out of sequence situation was discovered at approximately 10% power, the licensee bypassed all group A 3/4 rods full-in making that portion of the RSCS system inoperable in order to withdraw a group 2 rod which had been erroneously left inserted. Also on January 29, 1980, a reactor startup continued from Group 5 to Group 7 control rods while it was known to the operator that the group notch control mode of RSCS was inoperative.

This is an infraction

- E. As required by Technical Specification 6.8.2, changes to plant procedures shall be reviewed by the Plant Review Board (PRB) and approved by the plant manager prior to implementation. Technical Specification 6.8.3 allows temporary changes to procedures provided the intent of the original procedure is not altered, the change is documented, reviewed by the PRB and approved by the plant manager within 14 days.

Contrary to the above, on January 29, 1980 the licensee restored two out of sequence rods to their required positions while at 10% power which changed the intent of HNP-2-9207, Rod Movement Sequences, which requires rod withdrawal in a predetermined, consecutive order. This change was not documented as a temporary change or a change requiring prior approval.

This is an Infraction.

- F. As required by Criterion VI of Appendix B to 10 CFR 50 and as described in the Final Safety Analysis Report, Section 17.2.6.3, measures shall be established to control the issuance of drawing changes which assure that these changes are distributed to and used at the location where the prescribed activity is performed.

Contrary to the above, on March 4, 1980, during a spot check of Unit 2 drawings maintained in the control room, 16 of 30 drawings checked were not the current revision and were routinely being used in the conduct of plant operations.

This is an infraction.