



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA ST., N.W., SUITE 3100
 ATLANTA, GEORGIA 30303

Report Nos. 50-321/80-18 and 50-366/80-18

Licensee: Georgia Power Company
 270 Peachtree Street
 Atlanta, GA 30303

Facility Name: Hatch

Docket Nos. 50-321 and 50-366

License Nos. DPR-57 and NPF-5

Inspection at Plant Hatch, near Baxley, GA

Inspectors: H. C. Dance 4-30-80
 H. C. Dance Date Signed

P. T. Burnett 4-25-80
 P. T. Burnett Date Signed

Approved by: R. C. Lewis, Acting Chief, RONS Branch Date Signed

SUMMARY

Inspection on March 31 to April 2, 1980

Areas Inspected

This special, announced inspection involved 32 inspector-hours on site in the areas of followup of resident-inspector identified items of noncompliance, unit startup operations and post-modification testing.

Results

Of the three areas inspected, no items of noncompliance or deviations were identified in two areas; one apparent item of noncompliance was found in one area (Infraction - failure to perform post-modification testing - paragraph 7).

DETAILS

1. Persons Contacted

Licensee Personnel

- *W. A. Widner, Vice President Nuclear Generation
- *M. Manry, Plant Manager
 - T. V. Green, Assistant Plant Manager
 - S. K. Baxley, Superintendent of Operations
- *C. L. Coggins, Superintendent of Engineering Services
 - H. W. Dyer, Operations Supervisor
- *G. B. Ellis, I&C Supervisor
 - F. Gorley, Shift Supervisor
- *S. F. Curtis, Reactor Engineer
- *C. E. Belflower QA Site Supervisor
- *G. E. Spell, Jr., Senior QAFR

Other licensee personnel contacted included two shift foremen and six control room operators.

Other Organizations

Southern Company Services

L. K. Mathews, Manager Core Analysis and Licensing

NRC Resident Inspector

R. F. Rogers, Senior Resident Inspector

*Attended exit interview

2. Exit Interview

A meeting was held with those persons indicated in paragraph 1 on April 2, 1980. The scope and findings of the inspection were presented. The items of noncompliance related to the startup of unit 2 on January 28-29, 1980, which had been identified by the Senior Resident Inspector and reviewed during this inspection, were discussed. Also discussed, was another item of noncompliance involving failure to adequately test the rod sequence control system (RSCS) for unit 2 following modifications. The licensee acknowledged the comments. The inspectors stated that they accepted the arguments and analysis put forth by the licensee that the out-of-prescribed-order control rod withdrawal that occurred during the January 28-29 event did not appear to constitute an unreviewed safety question.

The inspectors stated that the number of errors associated with this startup is indicative that management controls have not been effective. The inspectors stated that a meeting between Georgia Power Company management and the

Director of Region II would be recommended. A meeting with GPC in Region II to discuss the items of noncompliance was subsequently held on April 16, 1980 (IE Report Nos. 50-321/80-20 and 50-366/80-20).

3. Licensee Action of Previous Inspection Findings

The special inspection took place in response to the items of noncompliance identified by the resident inspector (Inspection Report No. 50-366/80-11).

4. Unresolved Items

No new unresolved items were identified during this inspection.

5. Review of Unit 2 Startup Activities

In the course of the startup of unit 2 on January 28-29, 1980, two control rods were not withdrawn in the prescribed order. One of the rods was later withdrawn by improperly bypassing control-rod-position reed switches. This event and the related items of noncompliance are described in detail in the resident inspector's report (50-366/80-11). A late licensee event report, LER 50-366/1980-023, was issued by the licensee to describe the occurrence. The inspectors discussed the event with reactor operators, the reactor engineer and other members of the plant staff, and reviewed control room log books for the period in question. The inspectors concluded that the sequence of events was most likely different from that described in LER-023.

Specifically it appeared unlikely that the out-limit reed switch on rod 46-23 had been bypassed to permit movement of that rod in sequence and the required motion overlooked. It appeared that rod 46-43 (a group 2 rod) had been inadvertently skipped over, assumed to be withdrawn without independent verification of position, and then by-passed to improperly clear a proper RSCS rod withdrawal block when a group 3 rod was selected. The licensee concurred with this interpretation of events and agreed to submit a revised LER.

An item of concern raised when this event was first reported was whether or not an unreviewed safety question existed with respect to an increased probability or consequence of the rod drop accident. Prior to the inspection this issue was discussed extensively in telephone conversations with members of the IE Headquarters technical staff and NRR project management. During this inspection the licensee and his technical consultant addressed this issue in a line-by-line comparison with the requirements of 10 CFR 50.59. Their conclusion was that no unreviewed safety question existed. When asked if the issue of an unreviewed safety question had been considered prior to withdrawing rod 46-43, a licensee representative stated no. He then went on to say that the control rod configuration and power level were identical with conditions that exist during control rod scram time testing, when use of by-pass switches to facilitate control rod withdrawal is authorized under special test exception 3.10.2 of Technical Specifications.

Based upon all of the foregoing the inspectors concluded that there was no issue of an unreviewed safety question.

6. Procedure Review

Applicable plant procedures were reviewed for their relationship with the management control of the control rod error events for the January 28-29, 1980 startup. The following procedures were reviewed.

HNP 2-9207 Rev 1 Rod Movement Sequences
HNP 2-9402 Rev 1 Control Rod Scram Testing
HNP 2-1001 Rev 7 Normal Startup
HNP 2-2900 Rev 1 All A/B Sequence Rods not Full Out
HNP 2-2901 Rev 2 Rod bypassed
HNP 2-1924 Rev 1 RPIS Failure
HNP 2-2902 Rev 1 Rod Sequence Control System Malfunction

The review determined that instructions were not provided or were inadequate to control the bypassing of the control rod limit switches, to define the operability of the Rod Sequence Control System, and how to cope with an out of sequence control rod. These omissions contributed to the errors associated with these events during the startup. The licensee stated that instructions addressing RSCS operability would be provided to cover these cases (366/80-18-02). This is related to and will be reviewed along with the corrective actions taken for the items of noncompliance in the resident inspectors report dealing with procedural matters.

7. Design Control

The inspector reviewed Design Change Request (DCR) No. 79-342 associated with the Licensee Event Report 50-366/1980-008 Rev. 1 dated March 19, 1980, in which the rod sequence control system (RSCS) was found inoperable in notch control. The design change was confirmed to have had a preliminary review by the plant review board. The inspector judged the DCR to be erroneously checked as not involving a safety system; however, the main issue dealt with the inadequate checkout following the modification completion on December 2-3, 1979, with the unit at power. According to the associated Maintenance Request, the functional test was completed on or about January 16, 1980, during a control rod sequence exchange. In addition to not being timely, this specific test was performed at a power level in which the RSCS is automatically bypassed and therefore the test was inadequate. No other checkout was indicated to have been performed following the modification. Thus the inoperability of the RSCS in notch control was not noted until the reactor startup on January 29, 1980. This failure to perform a timely and appropriate test following a modification is an apparent item of noncompliance (366/80-18-01) with Technical Specification 6.8.1. HNP-809, Plant Modifications, which implements these requirements states that functional tests that are more than simple tests that can be described on the Maintenance Request must be provided written and approved functional test procedures. The test specified for this modification did not recognize that something more than a simple observation was warranted.