Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-3195

Mailing Address
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 868-5581

the southern electric system

W. G. Hairston, III
Senior Vice President
Nuclear Operations

HL-837
0411V

November 29, 1989

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

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
RESPONSE TO INSPECTION REPORT 89-19

Gentlemen:

In response to your letter of November 1,1989 and in accordance with the provisions of 10 CFR 2.201, Georgia Power Company (GPC) is providing the enclosed response to the Notice of Violation associated with NRC Inspection Report 89-19. A copy of this response is being provided to NRC Region II for review. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Should you have any questions in this regard, please contact this office at any time.

Sincerely,

W. G. Hairston, III

JKB/eb

Enclosure: Violation 89-19-01 and GPC Response

c: (See next page.)

IE01
1/1

c: Georgia Power Company
Mr. H. C. Nix, General Manager - Nuclear Plant
Mr. J. D. Heidt, Manager Engineering and Licensing - Hatch
GO-NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. L. P. Crocker, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebneter, Regional Administrator
Mr. J. E. Menning, Senior Resident Inspector - Hatch

ENCLOSURE 1

PLANT HATCH - UNITS 1 AND 2
NRC DOCKETS 50-321 AND 50-366
OPERATING LICENSES DPR-57 AND NPF-5
VIOLATION 89-19-01 AND GPC RESPONSE

VIOLATION 89-19-01

10 CFR 50.55a(g) requires adherence to Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code for inservice testing (IST) of pumps and valves. Technical Specification 4.0.5 also requires that the IST of ASME Code Classes 1, 2, and 3 pumps and valves be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. The licensee is committed to inservice testing in accordance with the 1980 Edition of the Code and Winter Addenda.

A. Section XI of the ASME Code, Subsection IWV-3410, requires valve stroke time corrective action based on comparing present full-stroke time test results with previous full-stroke time results.

   Contrary to the above, correct previous full-stroke time results were not used for valves E21-F001B, F004B, and F005B when they were tested on February 28, 1988. Previous full-stroke time results from November 17, 1987, were used instead of data taken after testing on November 24, 1987.

B. Section XI of the ASME Code, Subsection IWV-3520, requires check valves to be reverse flow tested.

   Contrary to the above, Unit 1 check valves E21-F044 A&B, E41-F046, and E51-F021 were not reverse flow testing during the 1988 refueling outage as specified by the licensee's IST Program.

C. Section XI of the ASME Code, Subsection IWV-3510 and Table IWV-3510-1, requires relief valves to be set point tested at specific frequencies based on the number of months since the initial startup for the 60 month cycle and the total valves in a category.

   Contrary to the above, the licensee's IST Program does not set point test relief valves in accordance with the frequencies in Table IWV-3510-1. The relief valves are set point tested in accordance with other frequencies.

The above three examples collectively constitute a Severity Level IV violation (Supplement I).

VIOLATION 89-19-01 AND GPC RESPONSE

RESPONSE TO VIOLATION 89-19-01

For ease and clarity of discussion each example will be addressed separately.

EXAMPLE A

Admission or denial of violation:

The violation occurred as described in Example A of the Notice of Violation.

Reason for the violation:

Example A was caused by an inadequate plant procedure. Procedure 31GO-INS-001-0S, "ISI Pump and Valve Operability Tests," contains instructions for implementing the inservice inspection (ISI) program at Plant Hatch. This includes general instructions for the performance of ISI valve testing. The procedure does not contain clear instructions regarding the recording and subsequent comparing of valve stroke times measured following valve maintenance. Consequently, valve stroke times for valves 1E21-F001B, 1E21-F004B, and 1E21-F005B measured following maintenance performed on November 24, 1987, were not recorded in the ISI test data log books and were not used for comparison with stroke times taken during the next ISI valve testing.

Corrective steps which have been taken and the results achieved:

As a result of this event, procedure 31GO-INS-001-0S has been revised temporarily to include clear and specific requirements to record and compare valve stroke times measured following valve maintenance. Additionally, procedure 95IT-0TM-001-0S, "Maintenance Work Order Functional Test Guideline," has been revised temporarily to require that functional tests for valves which involve stroke time measurements also include the requirement to record the stroke time in the ISI test data log books. Departmental Directives have been issued to applicable plant personnel informing them of these procedure changes and the new requirements.

VIOLATION 89-19-01 AND GPC RESPONSE

Corrective steps which will be taken to avoid further violations:

The temporary procedure revisions described above will be made permanent by 12/31/89. The temporary revisions will remain in effect until the permanent revisions are issued.

Date when full compliance will be achieved:

Full compliance was achieved on 11/20/89 when the temporary procedure revisions and the Departmental Directives were issued.

EXAMPLE B

Admission or denial of violation:

The violation occurred as described in Example B of the Notice of Violation.

Reason for the violation:

Example B was caused by a misinterpretation of relief request RR-V-30A. This relief request, contained in the Inservice Test (IST) Program, addresses check valves 1E21-F044A, 1E21-F044B, 1E41-F046, and 1E51-F021. The relief request currently states these check valves will be tested using a "pressure test." However, the relief request was revised prior to the 1988 Unit 1 refueling outage. It previously stated the check valves would be tested using a "local leak rate test." Personnel responsible for revising procedure 42SV-TET-001-1S, "Primary Containment Periodic Type B and C Leakage Tests," misinterpreted the revision to the relief request. They interpreted the new wording to mean these valves were to be tested by another IST procedure and, therefore, could be deleted from procedure 42SV-TET-001-1S. This interpretation was incorrect. The intent of the wording change appears to have been to differentiate between a test required by 10 CFR 50, Appendix J (a local leak rate test), and a test required by ASME Section XI (a pressure test). The test procedure should have remained 42SV-TET-001-1S; however, based upon the misinterpretation, procedure 42SV-TET-001-1S was incorrectly revised to delete the requirement to test the four check valves. As a result, the check valves were not tested during the last (1988) Unit 1 refueling outage.

VIOLATION 89-19-01 AND GPC RESPONSE

Corrective steps which have been taken and the results achieved:

As a result of this event, the appropriate personnel have been made aware of the correct interpretation of relief request RR-V-30A. Unit 2 procedure 42SV-TET-001-2S, "Primary Containment Periodic Type B and C Leakage Tests," was verified to be correct. The comparable Unit 2 check valves were pressure tested satisfactorily during the current refueling outage as required.

Unit 1 check valves 1E41-F046 and 1E51-F021 were disassembled and inspected during the last Unit 1 refueling outage. Check valves 1E21-F044A and 1E21-F044B have a good maintenance history (no problems in the last three years). The above provides reasonable assurance the check valves are capable of performing their design function until they can be pressure tested per Hatch's IST Program during the next Unit 1 refueling outage.

Corrective steps which will be taken to avoid further violations:

Procedure 42SV-TET-001-1S will be corrected prior to the start of the next Unit 1 refueling outage which is currently scheduled to begin 2/17/90.

Date when full compliance will be achieved:

Full compliance will be achieved when procedure 42SV-TET-001-1S is revised prior to the start of the next Unit 1 refueling outage.

EXAMPLE C

Admission or denial of violation:

The violation as described in Example C is respectfully denied.

On 09/20/89, Georgia Power Company (GPC) submitted the attached code inquiry to the Secretary of the ASME Boiler and Pressure Vessel Committee. As stated in the code inquiry, it is GPC's position that ASME Section XI, Division 1, IWV-3511 and Table IWV-3510-1 do not require a minimum number of safety and relief valves to be tested each refueling outage if the required cumulative total of valves tested is met or exceeded for each refueling outage. On 11/08/89, in response to the code inquiry, the appropriate ASME committee unanimously agreed with GPC's position regarding the requirements of IWV-3511 and Table IWV-3510-1.

At all times, the cumulative total of valves tested met or exceeded the number required to be tested at any point during the 60 month interval. Therefore, safety and relief valves were tested in accordance with the frequencies in Table IWV-3510-1 and no violation of Section XI occurred.

Southern Company Services, Inc.
Post Office Box 2625
Birmingham, Alabama 35202
Telephone 205 972-8347

IN 89-017

T. N. Epps
Manager Inspection
Testing and Engineering

Southern Company Services
the southern electric system

October 9, 1989

Secretary
ASME Boiler and Pressure Vessel Committee
345 East 47th Street
New York, New York 10017

Attention: Mr. Gerald M. Eisenberg

Dear Mr. Eisenberg:

After this letter was submitted, Southern Company Services (SCS) received a comment from the NRC requesting SCS modify the inquiry as noted below. The revised portion is in the Background section and it has been noted by a change bar in the right margin. SCS requests a response to respond to an NRC finding:

Subject

Section XI, Division 1, IWV-3511 and Table IWV-3510-1, Testing Schedule of Safety and Relief Valves (1980 Edition with Addenda through Winter 1981).

Inquiry

Does Section XI require that a minimum number of safety and relief valves be tested each refueling outage, regardless if the required cumulative total of valves tested is met or exceeded for each refueling outage?

Proposed Reply

No

Background

IWV-3511 requires that safety and relief valves be tested at the end of each time period as defined in Table IWV-3510-1. This table specifies that a minimum number of safety and relief valves be tested during the first refueling; however, a maximum is not stated. We believe the Code does not prevent the owner from testing a large number of valves one outage, and then testing none during the next several outages as long as the cumulative total in Table IWV-3510-1 is met and all valves are tested within 5 years.

The latest requirements would agree with the approach of not testing each outage. Table 2 of ANSI/ASME OM-1-1981 as referenced in the 1986 Edition of Section XI and approved by the NRC in 10 CFR 50.55a only requires that a minimum of 20% of the valves of each type and manufacture be tested within 48 months and therefore does not require testing each outage. Later Editions of Section XI and OM-1 also concur.

Your expeditious handling of this inquiry will be appreciated.

Sincerely,

MB/ld

cc: C. E. Jensen
C. V. Syx
000583