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the southern electric system

W. G. Hairston, III
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HL-898
0958I

January 2, 1990

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

PLANT HATCH - UNITS 1 AND 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
RESPONSE TO INSPECTION REPORT 89-30

Gentlemen:

In reponse to your letter of December 8, 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 89-30. 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 89-30-01 and GPC Response

c: (See next page.)

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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, 50-366
OPERATING LICENSES DPR-57, NPF-5
VIOLATION 89-30-01 AND GPC RESPONSE

VIOLATION 89-30-01

10 CFR 50 Appendix B, Criterion III, and the accepted QA Program require establishing measures to assure that applicable regulatory requirements and the design bases are correctly translated into specifications, drawings, procedures, and instructions. These measures shall include provisions to assure that appropriate quality standards are specified and included in design documents and that deviations from such standards are controlled. Measures shall also be established for the selection and review for suitability of application of materials, parts, equipment and processes that are essential to the safety related functions of structures, systems and components. Section 17.2.3 of the accepted QA Program requires the review of applicable regulatory standards, design bases, and requirements of the licenses to ensure that these factors are taken into account in preparation of drawings, specifications, and other design documents. The program endorses Regulatory Guide 1.64 and ANSI N45.2-11-1974. Section 4 of this standard specifically requires that appropriate quality standards be identified, documented and their selection reviewed and approved.

Contrary to the above, on January 12, 1985, plant modification package DCR 85-007, Revision 1, installed two commercial grade Agastat time-day relays, model 7022AD, in the 120V Class 1E instrument panels H11-P612 and H11-P613. A design basis for use of the non-seismically qualified relays in a seismic application was not provided in that an engineering evaluation and/or test to assess the seismic adequacy of the relays was not performed. Neither was a failure analysis of the relays during and after a seismic event performed to determine the effects on other safety related components mounted in the Class 1E instrument panels.

This is a Severity Level IV violation (Supplement 1).

RESPONSE TO VIOLATION 89-30-01

Admission or denial of violation:

The violation occurred as described in the Notice of Violation.

VIOLATION 89-30-01 AND GPC RESPONSE

Reason for the violation:

The violation was caused by less than adequate documentation by Southern Company Services (SCS) personnel. The documentation supporting the safety evaluation for modification package DCR 85-007, Rev.1, was less than adequate in that engineering judgements used as the basis for the detailed safety evaluation were not properly documented. Engineering judgement was utilized to evaluate and determine that the installation of the commercial grade relays in the class 1E panels under DCR 85-007, Rev.1, does not impact the qualification of the panels.

As documented in the safety evaluation for DCR 85-007, Rev.1, dated January 11, 1985, evaluations were completed by General Electric (GE), Bechtel, and SCS for their respective scope of responsibility. These evaluations reviewed the effects on the reactor water cleanup system operation due to the additional time delay and utilizing commercial grade relays for replacements. GE and Bechtel determined the effects of the additional time delay on system operations and concluded that the margin of safety would not be reduced by this modification. The use of commercial grade relays was reviewed by SCS to determine any adverse effects on system operations.

Recent interviews with SCS engineers responsible for DCR 85-007, Rev.1 revealed that seismic performance and failure modes of the commercial grade relays and the effect on safety related components were originally considered in preparing the safety evaluation. The original seismic evaluation performed by SCS concluded that the commercial grade relays are physically identical to the previously installed relays and should therefore remain structurally intact during and after a seismic event. The evaluation also included a class II over class I assessment which concluded that a loss of structural integrity during or following a seismic event could not result in adverse impact to safety-related equipment. However, this engineering judgement was not properly documented.

An evaluation of a potential electrical failure of the commercial grade relays was also performed to support the safety evaluation. Engineering judgement was utilized to assess the electrical isolation of the relays by existing fuses and the proper coordination with upstream breakers. This evaluation concluded that an electrical failure of relays G31-R616 C or D would not adversely affect the function of safety-related equipment. However, this evaluation was not properly documented.

VIOLATION 89-30-01 AND GPC RESPONSE

Corrective steps which have been taken and the results achieved:

SCS personnel have documented the engineering judgement used as a basis for use of the Agastat relays in question. On 12/22/89, SCS (Plant Hatch's architect/engineer) completed a formal verification of the seismic adequacy of the relays. The verification utilized test data to confirm that the commercial grade relays will maintain their structural integrity during and after a design basis seismic event thereby providing a documented basis for statements made in the referenced safety evaluation. An analysis has also been performed to verify the proper fuse to breaker coordination. The verification efforts considered the information provided in IEN 87-66, "Inappropriate Application of Commercial Grade Components."

Corrective steps which will be taken to avoid further violations:

Both Architect/Engineering firms which support Plant Hatch(SCS and Bechtel), as well as GPC corporate nuclear engineering and licensing personnel have been made aware of this event and the necessity of having a documented basis for all statements/ conclusions made in the safety evaluations they write.

Date when full compliance will be achieved:

Full compliance was achieved on 12/22/89 when an analysis was completed and documented that verified the relays to be seismically qualified.