



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

Report Nos. 50-321/81-20 and 50-366/81-20

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

Facility Name: Hatch 1 and 2

Docket Nos. 50-321 and 50-366

License Nos. DPR-57 and NPF-5

Inspection at Hatch site near Baxley, Georgia

Inspector: *P. R. Bemis* *9/1/81*
P. R. Bemis Date Signed

Approved by: *C. M. Upright* *9/1/81*
C. M. Upright, Section Chief Date Signed
Engineering Inspection Branch
Engineering and Technical Inspection Division

SUMMARY

Inspection on July 9-13, 1981

Areas Inspected

This special, unannounced inspection involved 56 inspector-hours on site in the areas of personnel qualifications; organization and administration; onsite review; training; requalification training; surveillance; nonroutine reporting; and mitigating core damage training.

Results

Of the eight areas inspected, no violations or deviations were identified in six areas; two violations were found in two areas (Failure to implement the required requalification training for licensed operators and senior operators - paragraphs 5, 9.b and 9.e; Failure to provide and maintain records of personnel training - paragraphs 9.a, 9.c, and 9.d).

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *S. Baxley, Superintendent of Operations
- *C. Belflower, QA Site Supervisor
- *C. Coggin, Superintendent Engineering and Services
- *T. Green, Assistant Plant Manager
- *M. Manry, Plant Manager
- *D. Moore, Supervisor - Nuclear Training
- *T. Wilkes, Nuclear Security Supervisor

Other licensee employees contacted included technicians, operators, mechanics, security force members, office personnel, supervisors, and shift supervisors and foremen.

NRC Resident Inspector

*R. Rogers

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on July 12, 1981 with those persons indicated in paragraph 1 above. The licensee acknowledged the inspection findings.

3. Licensee Action on Previous Inspection Findings

Not inspected.

4. Unresolved Items

Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve violations or deviations. New unresolved items identified during this inspection are discussed in paragraph 9.f.

5. Personnel Qualification Program (36701)

- References:
- (a) Technical Specifications, section 6, Administrative Controls
 - (b) ANSI N18.1-1971, Selection and Training of Personnel for Nuclear Power Plants
 - (c) Regulatory Guide 1.8, Personnel Selection and Training
 - (d) FSAR 13.1.3, Qualification Requirements for Nuclear Plant Personnel

The inspector reviewed the licensee's administrative controls to ensure that minimum educational, experience and qualification requirements have been established in writing and meet the requirements of the licensee's commitments to references (b) and (c) above. The inspector reviewed the qualifications for the following positions and the individuals occupying the listed positions:

Plant Manager, Assistant Plant Manager, Superintendent of Operations, Operations Supervisor, Shift Supervisor, Shift Foreman, Superintendent of Plant Electric Services, Plant Engineers, Shift Technical Advisors, Nuclear Training Supervisor, Superintendent of Maintenance, Maintenance Supervisor, Maintenance Foreman, Health Physics-Radiochemist, Health Physics Supervisor, Chemistry Supervisor, Senior Quality Control Specialist, Plant Operators and Selected Plant Craftsmen and Technicians.

Based on this review one item contributing to a violation was identified. Figure 6.2.2-1 in reference (a) requires plant operators to hold an NRC reactor operator's license. The inspector found that one individual who had been removed from license duties due to failing his annual requalification examination had worked in a licensed capacity prior to completing the requirements for having his license reinstated. Serving in a licensed capacity after an individual has been removed from licensed duties constitutes one example of a violation (321/81-20-01; 366/81-20-01). Other examples are given in paragraphs 9b and 9e.

6. Organization and Administration (36700)

References: (a) Technical Specifications, Section 6, Administrative Controls
(b) FSAR 13.1.2, Plant Organization

The inspector reviewed the plant organization structure as described in the facility technical specifications and the lines of authority and responsibility. The inspector also reviewed the recent change to plant organization structure had been reported to the NRC.

Based on this review, no violations or deviations were identified.

7. Onsite Review Committee (40700)

Reference: (a) Technical Specification 6.5.1, Plant Review Board

The inspector attended a meeting of the plant review board to ensure the following: The board was composed of a quorum of members on alternates defined in Technical Specifications 6.5.1.2 and 6.5.1.3 and the review process and qualifications were satisfied. Prior to the meeting, the inspector informed the board that his participation in no way reflected approval or disapproval of the decisions made. The inspector also reviewed minutes to previous meetings and frequency of meetings.

Based on this review and meeting attendance, no violations or deviations were identified.

8. Training (41700)

- References:
- (a) Technical Specifications, Section 6.0
 - (b) ANSI N18.1-1971, Selection and Training of Nuclear Power Plant Personnel
 - (c) Regulatory Guide 1.8, Personnel Selection and Training
 - (d) Regulatory Guide 8.13, Prenatal Radiation Exposure
 - (e) HNP-203, General Employee Training, Revision 1 dated 2/79

The inspector reviewed the training program which provides the required training for the facility staff personnel. This program was reviewed to verify that: the program complies with commitments contained in references (a) through (e) above; the program covers training in the areas of administrative controls and procedures, radiological health and safety, industrial safety, security procedures, emergency plan and quality assurance training, fire fighting training, and pre-natal radiation exposure training for females; and, audits are conducted by the licensee in the areas of general employee training. The inspector reviewed approximately 20 training records and interviewed 15 individuals (8 licensed and 7 non-licensed). The inspector also attended the general employee training and took the quiz which was administered for badging purposes.

Based on this review and attendance at the training, three items contributing to one violation and two inspector followup items were identified as discussed in paragraphs 8.a - c.

a. Security Violation

Three items contributing to one violation were identified. Due to the nature of the violation, these items will be discussed in Report Numbers 50-321/81-19; 366/81-19 and carry the following numbers for tracking (321/81-19-01; 366/81-19-01).

b. Failure to Teach Industrial Safety in General Employee Training

Reference (b), Section 5.4 states in part that all persons regularly employed in the nuclear power plant shall be trained in five areas and temporary maintenance and service personnel shall also be trained to the extent necessary to assure safe execution of their duties.

One of the areas listed for training, industrial safety, was not taught in the session attended by the inspector. Upon discussions with the Training Supervisor the inspector found that the licensee had realized the problem and was in the process of developing the necessary information for instruction in the industrial safety area. This item will

be carried as an inspector followup item (321/81-20-04; 366/81-20-04) until the licensee factors this information into their general employee training.

c. Weaknesses in Presentation of Training Material During General Employee Training

The inspector attended an entire general employee training class and although the program as a whole was adequate the following weaknesses were noted and discussed with the Training Supervisor.

- (1) During the discussion on dose limits the instructor referred to the 5(N-18) concept addressed in 10 CFR 20.101(b)(2) as a "banking system" whereby one could draw on his account to obtain large amounts of exposure. This banking concept is contrary to industry philosophy of ALARA.
- (2) When the instructors were going over an important concept, which was also on the quiz, they would make their point by telling the students that the reason they needed to know this concept was because they would see it again later that day rather than addressing the safety significance.
- (3) The slide used for the definition of radiation area and high radiation area defines these areas in terms of dose rates which are contrary to 10 CFR 20.202 which defines these areas in terms of doses.
- (4) When the instructor was teaching the definitions and signs in 10 CFR 20.203 he would linger on the definitions, which were on the quiz, and skip through the signs which are used to alert personnel to problem areas.

The Training Supervisor assured the inspector these areas would be addressed and changed as soon as possible. These four items will collectively constitute an inspector followup item (321/81-20-05; 366/81-20-05).

9. Requalification Training (41701)

- References:
- (a) Technical Specifications, Section 6.4, Training
 - (b) 10 CFR 55, Appendix A, Requalification
 - (c) ANSI N18.1-1971, Selection and Training of Nuclear Power Plant Personnel
 - (d) Regulatory Guide 1.8, Personnel Selection and Training
 - (e) FSAR 13.2, Conduct of Operation
 - (f) HNP 200, Licensed Plant Personnel Training and Retraining, Revision 6 dated 1/81
 - (g) Quality Assurance Manual, Revision 35 dated 2/81

The inspector reviewed: the licensee's prepared schedule for conducting lectures; the licensee's prepared lesson plan for three lecture topics; and the licensee's inclusion in the requalification program of deficient areas identified by evaluation of the most recent annual examinations. The inspector determined which licensed operators: failed all or portions of the annual examinations; received unsatisfactory performance evaluations; had not performed licensed duties for a period four months or longer. The inspector verified the completion of appropriate follow through action for each of these individuals. The inspector reviewed the training records of 12 NRC Licensed Reactor Operators and Senior Reactor Operators to verify that they included: copies of annual written examinations and the individual responses, documentation of attendance at all required lectures, documentation of the required control manipulations, the results of performance evaluations, documentation of required additional training to satisfy deficient performance, documentation of completion of required procedure reviews and/or self-study. Additionally, the inspector interviewed ten SRO licensed individuals to verify that the training records reflect the actual training received.

Based on this review, five items contributing to two violations and one unresolved item were identified and discussed in paragraphs 9.a-f.

- a. Failure to Document Removal or Reinstatement of License Privileges to Licensed Shift Personnel.

Reference (f), Section 3.a requires licensed personnel who score less than 70% in any section or 80% overall on the annual requalification exam to be removed from licensed duties. Reference (g), Section 17.2 states in part that measures shall be established to assure records are maintained to provide documentary evidence and that these records include qualifications of personnel and these records shall be retrievable.

Contrary to the above, when the inspector reviewed the results of the 1980 requalification examination and found 12 people who had either made less than 80% overall or 70% in one or more sections, the licensee could only produce documentation in three cases where training had notified operations that the individuals had to be removed from licensed duties. The inspector reviewed the operating logs to determine if the nine individuals in question had been removed from shift licensed duties. Based on the review of the logs, it could not be determined that the individuals were removed from licensed duties. Based on the review of the licensee's records, no records could be produced to show where licensed personnel are removed from licensed duties when required. This failure to document removal from licensed duties contributes to a violation (321/81-20-02; 366/81-20-02). Other examples are given in paragraphs 9c and 9d.

b. Failure to Meet Requirements of Approved Requalification Program

References (a) and (b) requires the licensee to meet the requirements of their accelerated requalification program. Reference (f) which implements the approved program, requires that individuals who make less than 70% in any section or 80% overall attend an accelerated requalification lecture for the affected sections and pass an examination on that section.

When the inspector reviewed the means by which the licensee was meeting this requirements, the licensee was found to be deficient in the following three areas:

- (1) The licensee was taking credit for RO-level examinations when the individual failed a SRO section of the examination
- (2) The licensee took credit for an examination given by a vendor to an RO upgrade class to meet the criteria for SROs who had failed certain sections. The inspector determined that only 30% of the questions were SRO level
- (3) The licensee took credit for lectures and examinations given to individuals prior to the annual requalification examination being graded.

The three areas collectively contribute to an item of violation (321/81-20-01; 366/81-20-01). Other examples are given in paragraphs 5 and 9e.

c. Failure to Store QA Records in Qualified Containers

The licensee's Quality Assurance Manual, Section 17.2 requires in part that those records defined as QA records be stored in facilities which are constructed, located and secured to prevent destruction of the records through fire, flooding, theft, and deterioration by temperature and humidity conditions. Records of personnel qualifications QA records.

When the training department writes a memo to operations which requires an individual to be removed from licensed duties, this memo is being stored in the Training Supervisor's desk. This failure to meet the storage requirements for QA records contributes to a violation (321/81-20-02; 366/81-20-02). Other examples are given in paragraphs 9a and 9d.

d. Failure to Maintain Adequate Records for Requalification Program Attendance

Reference (A) requires reference (b) to be followed. Reference (b), Section 5a, requires in part that documentation of any additional

training administered in areas in which an operator or senior operator has exhibited deficiencies shall be maintained.

The licensee does not maintain records showing that operators or senior operators who are required to attend accelerated requalification lectures or annual requalification lectures have attended these required lectures. This failure to maintain records contributes to a violation (321/81-20-02; 366/81-20-02). Other examples are given in paragraphs 9a and 9c.

e. Failure to Make Annual Determination of Licensed Personnel Weak Areas

References (a), (b), and (f) require the licensee to determine annually the weak areas of licensed operators. The licensee did not make an annual determination for the 1980 requalification year, in that, one set of annual examinations was not graded for three months and one set was not graded for almost four months after the examinations were given. This failure to make an annual determination contributes to a violation (321/81-08-01; 366/81-20-01). Other examples are given in paragraphs 5 and 9b.

f. Failure to Meet NRC Grading Criteria on the Annual Requalification Examination

Reference (f) which implements the NRC approved requalification program and NUREG 0737, item I.A.2.1 which implements the March 28, 1980 letter from the Director of the NRC Office of Nuclear Reactor Regulation and has been committed to by the licensee. This requires in part that an individual making less than 80% overall on his annual requalification examination has failed the exam. If an individual fails the examination by making less than 80% overall, he shall take a new examination to include all sections of the examination. The licensee has interpreted this requirement to mean that if an individual makes less than 80% overall he only has to retake these sections where he made less than 80%. Until this item is reviewed by NRC management, it will be carried as unresolved (321/81-20-03; 366/81-20-03).

10. Surveillance (61700)

- References:
- (a) Technical Specifications, Section 4
 - (b) HNP 1-3405-0, RCIC Pump Operability, Revision 10 dated 5/81
 - (c) HNP 1-3405-1, Procedure Data Package
 - (d) HNP 2-3164-0, RHR Valve Operability, Revision 10 dated 6/81
 - (e) HNP 2-3164-1, Procedure Data Package
 - (f) HNP 1-3303-0, HPCI Pump Operability, Revision 11 dated 7/81
 - (g) HNP 1-3303-1, Procedure Data Package
 - (h) HNP 1-3316, HPCI Quick Start, Revision 4 dated 5/81

The inspector witnessed portions of the surveillance testing accomplished by the referenced procedures. For the tests witnessed the following was verified: the test procedure was available and in use; the special test equipment required by the procedure was calibrated; test prerequisites were met; system restoration was correct; tests were in conformance with technical specifications; completed tests were reviewed as required by technical specifications; tests were performed within the time frequencies specified by technical specifications; and tests were performed by qualified individuals.

Based on this review, no violations or deviations were identified.

11. Nonroutine Reporting Program (90714)

- References:
- (a) HNP 424, Notification of Significant Events, Revision 4 dated 3/81
 - (b) HNP 425, Deviation Report, Revision 7 dated 2/81
 - (c) HNP 426, Reactor Scram Report, Revision 4 dated 1/80
 - (d) HNP 428, Safety Limit Violation Report, Revision 0 dated 2/81
 - (e) HNP 450, Reportable Occurrence Reports, Revision 5 dated 10/80
 - (f) HNP 456, Reporting of Defects and Noncompliance, Revision 4 dated 4/80
 - (g) QA 05-13, Open Items Control, Revision 6 dated 10/80
 - (h) HNP 480, Industrial Sabotage and Unaccounted for Shipments, Loss, Suspected Theft, or Unlawful Diversion of Special Nuclear Material or Licensed Materials, Revision 3 dated 3/81
 - (i) HNP 482, Reporting Significant Trends, Revision 0 dated 3/81

The inspector reviewed references (a)-(i) to verify that administrative controls have been established: for the prompt review and evaluation of off-normal events to assure identification of safety-related events; for prompt review of planned and unplanned maintenance and surveillance testing to assure technical specification requirements are being met; for completion of corrective actions; and to insure recognition and reporting of 10 CFR 21 items. The inspector also verified that administrative controls were established for prompt review of vendor information that would effect licensee safety-related equipment.

Based on this review, no violations or deviations were identified.

12. NUREG 0737 Commitments (92704)

The inspector reviewed the licensee's commitments to NUREG 0737 in the areas of training of shift technical advisors and mitigating core damage training for operations and specialty group personnel. In addition to the

commitments, the inspector verified the licensee's development and implementation of the programs for shift technical advisors and mitigating core damage.

Based on a review of the licensee's commitments and implementation, no violations or deviations were identified.