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Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526 7020

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

USNRC REGION II
ATLANTA, GEORGIA



Georgia Power

southern electric system

November 13, 1981 NOV 17 A 9: 30

J. T. Beckham, Jr.
Vice President and General Manager
Nuclear Generation

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 3100
101 Marietta Street, NW
Atlanta, Georgia 30303

REFERENCE:
RII: JPO
50-321/50-366
Inspection Report 81-20

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

Concerning our meeting on October 29 regarding the reference, Georgia Power Company offers the following modifications to our response dated October 8 1981, to NRC Inspection Report 50-321/81-20 and 50-366/81-20 concerning the notice of violation for Hatch Unit 1 and Unit 2.

VIOLATION

A. Technical Specification 6.3 requires that the plant staff shall meet or exceed the requirement of ANSI N18.1-1971. Technical Specification Figure 6.2.2-1 requires certain plant operators to hold an NRC operator license. 10 CFR 55, Appendix A, requires the licensee to follow his NRC-approved operator requalification program.

1. ANSI N18.1-1971 requires an operator to hold an NRC operator license before accepting full responsibility for a licensed position.

Contrary to the above, one individual removed from licensed duties during the first week of December 1980 due to failing his annual requalification examination continued performing in a position requiring a license prior to meeting all requirements for the licensed position of January 4, 1981.

2. HNP-200, Licensed Plant Personnel Training and Retraining, Revision 3 dated January 1981, implements 10 CFR 55, Appendix A. This procedure requires that individuals who fail the annual requalification examination must attend accelerated requalification lectures and be administered an examination in those failed sections.

Contrary to the above, the licensee took credit for attendance at lectures and retake examinations to meet this requirement for the 1980 requalification year in the following unacceptable manner:

- a. Credit was given for reactor operator level examinations conducted by the plant when the personnel failure was on the Senior Reactor Operator level.

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U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Atlanta, Georgia 30303
November 13, 1981
Page Two

VIOLATION A (Continued)

- b. Senior Reactor Operators (SRO) who previously failed their examination were given credit for material presented by a contractor to a reactor operator upgrade class when approximately 70% of the upgrade examination was not SRO level.
 - c. Credit was given to one individual for lectures and examinations before the individual's examination papers had been graded.
3. 10 CFR 55, Appendix A, Section 4.a and the licensee's operator requalification program require annual written examinations which determine areas in which retraining is needed to upgrade licensed operator and senior operator knowledge.

Contrary to the above, an annual determination was not made for the 1980 requalification year in that one set of 1980 requalification examinations, even though conducted in a timely manner, were not graded for three months and a second set of 1980 requalification examinations required almost four months for grading.

This is a Severity Level IV Violation (Supplement I.D.).

RESPONSE

Item A.1

- a) Admission or denial of alleged violation: The violation is admitted.
- b) Reasons for violation: The subject individual was not notified of his removal from licensed duties because of insufficient plant administrative controls.
- c) Corrective steps which have been taken: Administrative controls have been implemented to ensure that in addition to Operations supervision, the licensee is also notified of his removal from licensed duties and of his responsibility not to manipulate plant controls until he receives a written requalification statement from the Training Department.
- d) Corrective steps which will be taken: The preceding action will prevent future violations.
- e) Date of full compliance: Full compliance was achieved on September 30, 1981.

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Atlanta, Georgia 30303
November 13, 1981
Page Three

RESPONSE (Continued)

Item A.2

- a) Admission or denial of alleged violation: The violation is admitted because a few licensed individuals did not receive the accelerated requalification lectures and examinations in the depth required by NRC policy.
- b) Reasons for violation: Georgia Power Company's training staff conducted accelerated requalification lectures and examinations in accordance with our interpretation of published NRC requirements. During recent meetings and conversations, the NRC defined its policy concerning this violation; therefore, the reason for our violation is associated with the fact that NRC policy in this area has not been published.
- c) Corrective steps which have been taken: Georgia Power Company has worked with the NRC to clearly define NRC policy concerning this violation, and our training staff is in the process of implementing programs to satisfy this policy. The following summarizes our requirements:

The NRC during our October 29 meeting detailed the following policy for accelerated requalification lectures and examinations:

- (1) Acceptable accelerated examinations require 3 to 5 questions for each section of the annual examination below 70%.
- (2) Acceptable accelerated lectures require 2 to 4 instructor contact hours for each section of the annual examination below 70%.
- (3) After the annual examination is administered, normal requalification training can count as accelerated training provided that preceding items (1) and (2) are satisfied.

The following additional recommendations were made by the NRC Operator Licensing Branch Chief on November 3, 1981:

- (1) Georgia Power should maintain a question bank of RO and separate SRO questions for examinations.

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Atlanta, Georgia 30303
November 13, 1981
Page Four

RESPONSE ITEM A.2 (Continued)

- (2) The NRC will audit this question bank to ensure that the appropriate question depth and difficulty is maintained. The NRC encourages Georgia Power to routinely add to or change the question bank to respond to plant changes, industry lessons learned and changing regulations.
 - (3) For annual and accelerated license operator required examinations, RO's can be given credit for SRO questions, but SRO's can be given credit for RO questions only if these questions are in the RO Features of Facility Design, Instrument and Control, and Safety and Emergency Systems categories. For SRO annual examinations, 30% \pm 5% of the examination should consist of RO questions from the previous categories.
- (d) Corrective steps which will be taken: The preceding NRC policy requirement and recommendations will be implemented.
- (e) Date of full compliance: Full compliance will be achieved on January 1, 1982.

Item A.3

- a) Admission or denial of alleged violation: The violation is admitted.
- b) Reasons for violation: Several annual examinations in 1980 were graded after a substantial time had elapsed due to workload.
- c) Corrective actions which have been taken: Contract instructors have been added to our staff to reduce the workload, and annual examinations are now graded within two months.
- d) Corrective actions which will be taken: Georgia Power is increasing its training staff and will change its administrative procedures to require that all examinations are graded normally within one month and under unusual conditions with Corporate Office approval within two months.
- e) Date of full compliance: Full compliance will be achieved on December 1, 1981.

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Atlanta, Georgia 30303
November 13, 1981
Page Five

VIOLATION

B. 10 CFR 50, Appendix B Criterion XVII requires that sufficient records shall be maintained to furnish evidence of activities affecting quality. The records shall include qualification of personnel. It also requires the applicant to establish requirements concerning record retention and location. The Quality Assurance Manual (QAM) Section 17.2, Revision 35 dated February 1981 implements this requirement.

1. The QAM states that QA records shall be stored in facilities which are constructed, located and secured to prevent destruction of the records through fire, flooding, theft and deterioration by temperature or humidity."

Contrary to the above, personnel qualification records in the form of records removing a licensed operator from licensed duties are being stored in the Training Supervisor's desk which does not meet the above criteria.

2. The QAM requires QA records to be maintained.

Contrary to the above, the licensee could not furnish records on 9 of 12 people which had been removed from licensed duties due to failing the 1980 annual requalification examination.

3. In addition to QAM Section 17.2 which requires evidence of activities affecting quality, 10 CFR 55, Appendix A, Section 5.a and the licensee's approved program require that documentation of any additional training administered in areas in which an operator or Senior Operator has exhibited deficiencies shall be maintained.

Contrary to the above, records were not being maintained to show that operators and senior operators have attended the required accelerated requalification or annual requalification lectures.

This is a Severity Level V Violation (Supplement I.E.).

RESPONSE

- a) Admission or denial of alleged violation: The violation is admitted because the records which were maintained did not furnish straight forward evidence of the satisfactory completion of the requirements.

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Atlanta, Georgia 30303
November 13, 1981
Page Six

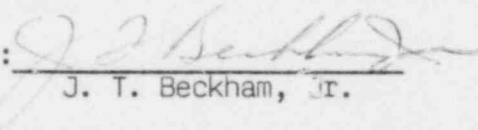
RESPONSE (Continued)

- b) Reason for violation: Georgia Power Company's plant staff maintained copies of examination results and plant logs for records. The NRC did not consider these records as sufficient evidence of the satisfactory completion of the requirements.
- c) Corrective steps which have been taken: New record formats have been implemented to satisfy NRC requirements including training notification to licensed operators of removal of and reinstatement to licensed duties, and daily lecture attendance records for all courses conducted on site. For courses conducted offsite only course completion records will be maintained.
- d) Corrective steps which will be taken: The preceding action will prevent future violations.
- e) Date of full compliance: Full compliance was achieved on November 6, 1981.

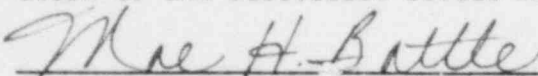
If you have any further questions regarding Inspection Report 81-20, please do not hesitate to contact my office.

J. T. Beckham, Jr. states that he is Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that to the best of his knowledge and belief the facts set forth in this letter are true.

GEORGIA POWER COMPANY

By: 
J. T. Beckham, Jr.

Sworn to and subscribed before me this 13th day of November, 1981.



Notary Public, Georgia, State at Large
My Commission Expires Sept. 20, 1983

Notary Public

GB/mb

xc: M. Manry
R. F. Rogers, III