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USNRC REGION II  
ATLANTA, GEORGIA

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Georgia Power

the southern electric system

March 2, 1982

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  
81-34

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

The referenced inspection report identified four violations of NRC requirements. We have reviewed the violations and offer the following responses:

VIOLATION A

10 CFR 50 Appendix B, Criterion V requires that written procedures be implemented and Criterion XVI as implemented by Hatch Quality Assurance Manual, section 16, paragraph 16.1, requires that measures be established to assure that, for significant conditions adverse to quality, corrective action is taken to preclude repetition.

Contrary to the above, written procedures were not implemented and effective corrective action not taken in that on four different occasions within the past three years, the licensee has lost, misplaced or improperly documented transfer of special nuclear material (incore detectors) controlled by procedure HNP-1/2-9600, Special Nuclear Material Inventory and Transfer Control. The four instances were reported in Licensee Event Reports 50-321/79-54, 50-366/79-112, 50-321/80-117, and 50-366/81-99.

RESPONSE

1. The violation occurred as stated.
2. The violation occurred due to the number of different people involved with handling a detector from receipt to final disposal, which has produced difficulties in establishing and maintaining positive control. In the past the practice of allowing used IRM and SRM detectors to decay in temporary locations to reduce personnel exposure seems to have provided the weak link in the control process.

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RESPONSE (Continued)

3. To prevent recurrence, radiation levels permitting, used detectors will be moved directly from the vessel to a permanent storage location consisting of a shielded receptacle in the TIP room until final offsite disposal. Additionally, responsibility for controlling the movement of irradiated detectors has been formally assigned to one member of the plant staff.
4. We believe that these additional actions are sufficient to ensure proper control over special nuclear material, resulting in full compliance with the Hatch QA manual section 16.1 on January 4, 1982.

VIOLATION B

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documented procedures which shall contain appropriate acceptance criteria for determining that important activities have been satisfactorily accomplished. The accepted QA program for Unit 2, FSAR Section 17.2.5, also requires appropriate acceptance criteria in procedures.

Contrary to the above, appropriate acceptance criteria were not contained in plant procedure HNP-1/2-3160, Residual Heat Removal Pump Operability. The surveillance procedure did not require individual verification of the room cooler auto start feature for each of the two Residual Heat Removal (RHR) pumps in the room. This procedural deficiency was reported by the licensee in LER 50-321/81-105 as a result of the failure of the Unit 1 cooler to continue to run when one of the RHR pumps was stopped during a maintenance outage. A loose wire to a relay in the cooler actuation circuitry caused the malfunction. The wire had been loose, undetected by required surveillance, since 1975.

RESPONSE

1. The violation occurred as stated.
2. It occurred because surveillance procedures did not require individual verification of room cooler auto start feature for each RHR pump in conjunction with a manual pump start. The auto start feature for area cooling of the diagonal room in question was redundant since activation of the RHR "A" Pump and the Core Spray "A" pump, which would occur in an accident condition, would have still caused the area cooler to function properly.

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RESPONSE (Continued)

3. To correct this omission and prevent recurrence, verification of the room cooler auto start feature in conjunction with a manual start of each of the two RHR pumps in each of the two RHR pump rooms has been included in the respective units RHR pump operability procedures, HNP-1-3160 and HNP-2-3160. The procedure revisions verifying area cooler operability were made effective October 16, 1981 for HNP-1 and December 1, 1981 for HNP-2.
4. Full compliance with 10CFR50, Appendix B, Criterion V and Unit 2 FSAR Section 17.2.5. was achieved on October 16, 1981 for Unit 1 and December 1, 1981 for Unit 2.

VIOLATION C

Technical Specification 6.9.1.f. requires that personnel error or procedural inadequacy which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the SARs be reported within 24 hours to the NRC regional office with a written report within 14 days.

Contrary to the above, when in September, 1981, it was discovered that the area room cooler for 2E Residual Heat Removal (RHR) pump would not auto start as required by Technical Specification 3.5.K and described in FSAR Section 10.18, the licensee failed to make the required 24-hour oral and 14-day written reports to the NRC. The licensee did, however, submit a 30-day report (LER 50-321/81-105) describing the incident. The area room cooler would not automatic start due to failure to terminate a wire during a design change completed in 1975 and an inadequate surveillance procedure which prevented its detection.

This violation is applied to Unit 1 only.

RESPONSE

1. The violation occurred as stated.
2. The reason for the delay in notification was that the safety function of the area coolers was determined not to be compromised in the event of an accident as analyzed in the FSAR because the auto start feature of the area coolers would be prevented only when the RHR "C" Pump was started singly, whereas in any conceivable accident scenario the RHR "A" Pump and the Core Spray "A" Pump located in the same diagonal room would have started, causing the

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RESPONSE (Continued)

affected area cooler to start per design. In addition, the auto start of the area coolers on area high temperature remained fully functional. For these reasons, it was the interpretation of site personnel that the fulfillment of the functional requirements of the RHR system to an FSAR analyzed accident was not compromised, and that a thirty-day written report (LER 50-321/81-105) was the appropriate level of notification.

3. Site personnel involved with Technical Specification interpretation and determination of the level of reporting requirements have discussed the concerns expressed by I&E in the subject violation notice, and recognizing the importance of assessing these factors correctly when interpreting the reporting requirements for future events, will be able to include this insight in the evaluation process.
4. Plant Hatch is in full compliance with the Technical Specification Reporting Requirements identified in this item as of December 20, 1981.

VIOLATION D

Technical Specification 3.7.6.1.b. requires that with the fire suppression water system inoperable, a special report shall be submitted by telephone with 24 hours to the NRC Regional Office.

Contrary to the above, following a fire main rupture at 02:30 a.m. on December 15, 1981, the Regional Office was not notified of the event until 3:40 p.m. on December 16, 1981.

This violation is applicable to Unit 2 only.

RESPONSE

1. The violation occurred as stated.
2. This delay in notification is attributed to the fact that all pertinent data concerning this event had not been acquired until the morning of December 16, 1981, and more specifically the deviation report concerning this event was not submitted until that same morning. Therefore, the reporting mechanism was triggered unnecessarily late.

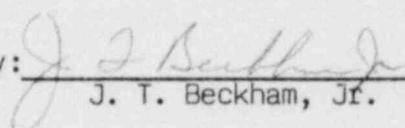
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RESPONSE (Continued)

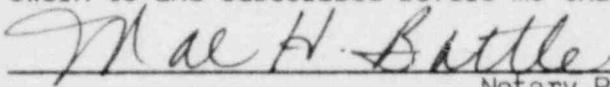
3. Personnel involved in this event have been instructed in the importance of promptly reporting all variances from the Limiting Conditions of Operation via the plant deviation reporting mechanism established in HNP-425 "Deviation Report" to prevent repetition of this violation.
4. Therefore, full compliance is considered to exist at this time with reporting requirement for LCO deviations.

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 2nd day of March, 1982

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

CS/mb

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