UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

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Report Nos.: 50-321/90-10 and 50-366/90-10

Licensee: Georgia Power Company
P. O. Box 1295
Birmingham, AL 35201

Docket Nos.: 50-321 and 50-366 License Nos.: DPR-57 and NPF-5

Facility Name: Hatch 1 and 2

Inspection Conducted: April 16-20, 1990

Inspector: A. Gooden 05-03-90
A. Gooden Date Signed

Approved by: E. D. Testa for 05-03-90
W. Rankin, Chief Date Signed
Emergency Preparedness Section
Emergency Preparedness and Radiological
Protection Branch
Division of Radiation Safety and Safeguards

SUMMARY

Scope:

This routine, unannounced inspection was to determine if the licensee's emergency preparedness program was being maintained in a state of operational readiness. Areas examined included training; independent audits; maintenance of emergency response equipment and facilities; distribution of changes to the Emergency Plan and Emergency Plan Implementing Procedures (EIPs); program changes since the August 1989 inspection; staff augmentation; and the adequacy of licensee actions taken on previously identified inspection findings.

Results:

Within the areas examined, a non-cited violation (NCV) was identified for failure to properly classify an event (during a walkthrough) in accordance with Procedure 73EP-EIP-001-0S (Paragraph 5). The licensee's emergency preparedness program elements appeared to be adequately addressed, implemented, and effectively managed. Noted program strengths were as follows: independent audit; event classification training during simulator exercises; equipment inventories and operability checks were well documented including the corrective actions to resolve discrepancies; and maintenance of emergency response facilities (ERFs).

REPORT DETAILS

1. Persons Contacted

Licensee Employees

J. Barnes, On-Shift Operations Supervisor
S. Barr, Supervisor, Maintenance
S. Brunson, Senior Engineer
*C. Coggin, Manager, Training and Emergency Preparedness
*W. Drinkard, Manager, Safety Audit and Engineering Review
*P. Fornel, Manager, Maintenance
N. Lewis, Shift Clerk
*B. Manning, Nuclear Specialist, Safety Audit and Engineering Review
G. Miles, Shift Clerk
*C. Moore, Assistant General Manager, Plant Support
*R. Mothena, Coordinator, Emergency Preparedness
*R. Musgrove, Acting Manager, Operations
*H. Nix, General Manager
D. Pendry, Shift Supervisor
*D. Read, Assistant General Manager, Plant Support
*L. Sumner, Assistant General Manager, Plant Operations
*S. Tipps, Manager, Nuclear Safety and Compliance

Other licensee employees contacted during this inspection included engineers, operators, security force members, technicians, and administrative personnel.

Nuclear Regulatory Commission

*F. Jape, Chief, Quality Programs Section, RII
*J. Menning, Resident Inspector
*L. Zerr, Reactor Engineer, NRR

*Attended exit interview

2. Emergency Plan and Implementing Procedures (82701)

Pursuant to 10 CFR 50.47(b)(16), 10 CFR 50.54(q), and Appendix E to 10 CFR Part 50, this area was reviewed to determine whether changes were made to the program since the last routine inspection (August 1989), and to assess the impact of these changes on the overall state of emergency preparedness at the facility.

The inspector reviewed Section P of the licensee's Emergency Plan and discussed with a licensee representative the licensee's program for making changes to the Plan and EIPs. The inspector verified that changes to the Plan and procedures were reviewed and approved by management in accordance with procedures governing the development, review, and approval. A review

of transmittal sheets disclosed that changes were being distributed to the NRC within 30 days of the approval date. Since the last inspection, changes incorporated as Revision 9 to the Hatch Emergency Plan were approved by NRC in August 1989. During the inspection, documentation was provided to show that changes incorporated as Revision 10 were submitted to NRC on April 2, 1990. Revision 10 changes included updated letters of agreement, organization changes; clarification to Emergency Action Levels (EALs); title changes to Table B-1; editorial changes; and dispatch location for Plant Equipment Operators.

Controlled copies of the Emergency Call-List, Emergency Plan, and EIPs were audited in the Control Room, Technical Support Center (TSC), and the Emergency Operations Facility (EOF). The selected documents were found to be current revisions.

No violations or deviations were identified.

3. Emergency Facilities, Equipment, Instrumentation, and Supplies (82701)

Pursuant to 10 CFR 50.47(b)(8) and (9), Section IV.E of Appendix E to 10 CFR Part 50, and Section H of the licensee's Emergency Plan, this area was inspected to determine whether the licensee's ERFs and other essential emergency equipment, instrumentation, and supplies were maintained in a state of operational readiness.

Discussions were held with a licensee representative concerning modifications to facilities, equipment, and instrumentation since the last inspection. The inspector toured the Control Room, TSC, and Operations Support Center (OSC) and noted that facilities were in accordance with Section H of the Emergency Plan. The inspector was informed by a member of the licensee's staff that no facility changes had occurred since the August 1989 inspection. In assessing the operational status of the emergency facilities, the inspector verified that protective equipment, and supplies were operational and inventoried on a periodic basis. Emergency Kits and or cabinets from the Control Room, TSC, OSC, and External Survey Kit were inventoried and randomly selected equipment was checked for operability. The selected equipment operated properly, displayed current calibration stickers, and successful battery and source checks were obtained. By review of applicable procedures and check-list documentation covering the period of August 1989 to March 1990, the inspector determined that emergency equipment (e.g. communication equipment, EOF air handling system, and emergency kits) was being checked in accordance with the procedures governing such tests. Records reviewed indicated that all discrepancies or problems identified during inventories and communications checks were corrected in a timely manner. The inspector observed a daily operability check on the meteorological equipment in the EOF. In addition, during the Control Room tour, the inspector noted that the Unit 2 monitoring instrumentation (e.g. main stack monitor, Reactor Building Vent Monitor, meteorological parameters, etc.) for post accident assessment and dose projection was operational.

The licensee's management control program for the Prompt Notification System was reviewed. According to documentation, as of December 1989, the system consisted of 2,888 radios. Weekly radio tests were performed by the National Oceanic and Atmospheric Administration (NOAA), National Weather Service Office. Documentation which summarized the Calendar Year 1989 testing of the Prompt Notification System disclosed the following: (1) signal availability for 1989 was greater than 99 percent; (2) full system activation test performed on October 25, 1989 during the Hatch annual exercise; (3) a telephone survey conducted subsequent to the exercise disclosed that 88 percent of the people sampled were notified via Tone Alert radios during the exercise; and (4) actions taken to resolve test discrepancies were well documented.

Since the last inspection, new transient notification signs were obtained; these signs are larger and therefore more visible. At the time of the inspection, signs were being installed at 18 locations within the 10-mile Emergency Plan Zone (EPZ) for providing instructions to the public regarding actions to take in the event of an emergency at Hatch. Two locations were verified by the inspector as having the appropriate warning information.

No violations or deviations were identified.

4. Organization and Management Control (82701)

Pursuant to 10 CFR 50.47(b)(1) and (16), Section IV.A of Appendix E to 10 CFR Part 50, and Section B of the licensee's Emergency Plan, this area was inspected to determine the effects of any changes in the licensee's emergency organization and/or management control systems on the emergency preparedness program, and to verify that any such changes were properly factored into the Emergency Plan and EIPs.

The inspector's discussion with a member of the licensee's staff disclosed that one change had been made involving the plant staff since the August 1989 inspection. Previously, the Manager, Plant Training and Emergency Preparedness reported directly to the General Manager of Plant Hatch. As a result of an organization change, the Manager, Plant Training and Emergency Preparedness reports to the Assistant General Manager of Plant Support, who reports to the General Manager of Plant Hatch. This change in reporting does not appear to affect the effectiveness of the emergency preparedness program implementation. Remaining change involving the site emergency preparedness program was a title change for the individual assigned day-to-day program implementation responsibility. There were no changes to the corporate organization and offsite support agencies. Agreement letters were recently updated with the offsite support agencies listed in Appendix 2 of the Hatch Emergency Plan.

No violations or deviations were identified.

5. Training (82701)

Pursuant to 10 CFR 50.47(b)(2) and (15), Section IV.F of Appendix E to 10 CFR Part 50, and Section O of the Emergency Plan, this area was inspected to determine whether the licensee's key emergency response personnel were properly trained and understood their emergency responsibilities.

The inspector reviewed Section O of the Emergency Plan and the Implementing Procedure (75TR-TRN-001-0S) for a description of the training program and training procedures. In addition, selected lesson plans and/or instructor guides were reviewed. Since the last inspection, the licensee had implemented a plant-wide tracking system for training known as "Training Records and Qualification System" (TRAQS).

Discussions with cognizant members of the licensee's staff regarding emergency preparedness training disclosed plans to revise the current training program and change to the Systems Approach Training (SAT) process. The SAT process is task oriented training. According to documentation and discussions with cognizant members of the licensee's staff, the required training is based on task assignments for a given position to the emergency organization, and appears to be job-specific oriented training. There are several completion phases required before full program implementation (e.g. analysis, design, and development). At the time of this inspection, many of the actions necessary before program implementation had been completed. Although a detailed review of each phase was not within the scope of this inspection, the inspector reviewed the System Master Plan document entitled Emergency Preparedness Training. The inspector was informed by a licensee contact that full program implementation would be completed when all emergency response personnel had received training under the SAT.

The inspector interviewed several individuals assigned to the emergency organization regarding their role and responsibility during an emergency. Two individuals were designated as Control Room Communicators, and one individual as the OSC Manager. No problems were noted in the areas of notification, communication, activation, roles and/or responsibilities in the emergency organization. In addition, the inspector conducted a walkthrough evaluation with two individuals who may be designated as the Interim Emergency Director; and observed two licensee conducted simulator exercises. During the walkthrough evaluation, two interviewees were given hypothetical emergency conditions involving two different events: (1) a fire lasting more than 10 minutes in the High Pressure Coolant Injection (HPCI) Room; and (2) loss of emergency diesels due to onsite tornado damage. In response to the scenario involving a fire in the HPCI Room, both interviewee's classified the event initially as an Alert declaration in accordance with Procedure 73EP-EIP-001-0S (Emergency Classification and Initial Actions). When questioned regarding the fire actually affecting the HPCI operability, both interviewees consulted the Fire Protection Procedure 34AB-FPX-053 and indicated that the event would be declared as a Site Area Emergency due to the loss of safety system that requires a plant

shutdown. According to the fire protection procedure, HPCI is included as a required system for safe shutdown. Consequently, a fire directly affecting HPCI, or by virtue of de-energizing HPCI in accordance with Section 8.5.5 of the fire protection procedure would result in the Site Area Emergency declaration. A more detailed review and discussion of this event with operations and emergency preparedness personnel resulted in what appears to be a procedural inconsistency that results in a higher emergency class than actual plant conditions warrant by virtue of a single component failure within the safe shutdown system. Further, according to a licensee representative, Technical Specification requirements provides a 7-14 day limiting condition for operation (LCO) for out of service HPCI. This item was assigned by the licensee as a commitment in the action item tracking (AIT) system for performing a detailed review and corrective action to resolve the in-consistency between the fire protection procedure and the EALs to ensure that guidance in NUREG-0654 and the appropriate fire protection requirements are satisfied. The inspector informed licensee representatives that the corrective actions will be reviewed during a subsequent visit. In response to the postulated accident involving loss of emergency diesels due to tornado damage, one of the interviewee's incorrectly classified the event as a Notification of Unusual Event. As additional details were provided, the interviewee upgraded to an Alert declaration. However, according to Section 10.2.3.2 of the Classification procedure (73EP-EIP-001-0S), a Site Area Emergency existed if damage resulted from an onsite tornado and either unit not in cold shutdown. In response to the incorrect event declaration, the inspector was informed by licensee representatives that the interviewee would be evaluated during a simulator driven drill involving a confidential and unrehearsed scenario. As an objective, the individual would be expected to properly classify the accident and complete the emergency notification form in accordance with procedures. In addition, EAL training would be conducted to ensure personnel's familiarity with events in the natural phenomenon category. The interviewee was observed during a simulator drill involving an automatic transient without scram (ATWS). No problems were noted. The event classification was both prompt and correct. One additional individual was observed responding to a simulator drill involving a loss of coolant accident (LOCA). No problems were noted. During both simulator observed exercises, event declarations were both timely and correct. The emergency notification forms used for State/local notifications were also completed in accordance with procedures. In light of the aforementioned actions subsequent to the walkthrough, this apparent violation for failure to properly classify an event was discussed with Regional Management; and since all requirements specified in 10 CFR Part 2, Appendix C, Section V of the NRC Enforcement Policy (1990) were satisfied, the licensee was informed that this finding was considered a non-cited violation (NCV).

NCV 50-321, 366/90-10-01: Failure to properly classify an event in accordance with the emergency classification procedure 73EP-EIP-001-0S.

Training records were reviewed for selected members of the onsite emergency organization. Training records were chosen based on the

March 1990 emergency response position matrix. Fourteen names were randomly selected from various emergency positions on the emergency response position matrix. When personnel training records were compared with position assignments, no problems were noted. Documentation was also available to show that semi-annual health physics drills were conducted in accordance with plan and procedural commitments. Training was reviewed for the offsite medical and fire support agencies. No problems were noted. Training was provided to Medical Support agencies during August and October 1989. According to documentation, fire support training was offered several times during Calendar Year 1989, but due to community responsibilities, the Fire Department personnel were unable to attend.

One violation was identified.

6. Independent Review/Audits (82701)

Pursuant to 10 CFR 50.47(b)(14) and 10 CFR 50.54(t), this area was inspected to determine whether the licensee had performed an independent review or audit of the emergency preparedness program, and whether the licensee had a corrective action system for deficiencies and weaknesses identified during exercises and drills.

According to documentation, independent audits were conducted by the site Safety Audit and Engineering Review (SAER) Group on the following dates: July 24, 1989-August 16, 1989 (documented in Audit Report No. 89-EP-2), and January 11, 1990-February 2, 1990 (documented in Audit Report No. 90-EP-1). The Georgia Power Corporate Office, SAER Group, conducted an audit during April 17, 1989 - May 3, 1989 (documented in Audit Report No. 89-3). The referenced audit was previously reviewed by the NRC during the last routine inspection (Report Nos. 50-321, 366/89-18).

The licensee's program for follow-up action on audit, drill, and exercise findings was reviewed. The exercise and drill findings were tracked in accordance with the Training Department Procedure for action item tracking. Quality Assurance and NRC audit findings were tracked by Nuclear Safety and Compliance via the Action Item Tracking System (known as AIT). The inspector reviewed a sample of items from the annual exercise conducted during October 1989, and noted that items were assigned to various departments or individuals with a tentative completion date.

No violations or deviations were identified.

7. NRC Information Notice (92703)

The inspector discussed with a licensee representative their response to the following Information Notices (INs):

- IN No. 89-89 "Event Notification Work Sheets." The inspector reviewed documentation which disclosed the licensee had reviewed the referenced IN and determined that the additional information in the

IN would be applicable to their site and procedures. The current procedure (30AC-OPS-003-0S) which provides guidance for making 10 CFR 50.72 reports was being revised to include the additional information contained on NRC Form 361 attached to the IN.

- IN No. 90-08 "Kr-85 Hazards From Decayed Fuel." According to a licensee contact, the aforementioned Notice was assigned for review and evaluation of site applicability and actions. However, at the time of the inspection, the review was incomplete.

8. Action on Previous Inspection Findings (92701)

(Closed) Inspector Follow-up Item (IFI) 50-321, 366/87-32-01: Evaluate the adequacy of the EOF dose assessment model.

The inspector reviewed documentation which disclosed the licensee had taken actions in accordance with the commitments stated in a letter to the NRC dated April 18, 1988. The licensee's review and evaluation of the dose assessment methodology resulted in various modifications to the dose projection procedure (73EP-EIP-015-0S).

(Open) IFI 50-321, 366/89-18-01: Conduct an unannounced augmentation drill to verify Table B-1 augmentation requirements.

The subject drill was conducted on January 18, 1990 as a repeat drill because augmentation times were not met during a previous drill conducted on May 31, 1989. During the January 1990 drill, the EOF and OSC were not activated within 60 minutes. The activation times were 97 minutes for the OSC and 74 minutes for the EOF. A Management Oversight Risk Tree (MORT) analysis was conducted into the root cause for failure to activate within 60 minutes. The licensee has been responsive and prompt in identifying augmentation problems and initiating corrective actions (e.g. notification procedural revision; training additional personnel for various roles in the emergency organization; and polling personnel regarding their estimated time of arrival to plant as a function of family responsibility during off-hours). However, this item remains open pending a follow-up Calendar Year 1990 drill.

9. Exit Interview

The inspection scope and results were summarized on April 20, 1990, with those persons indicated in Paragraph 1. The inspector described the areas inspected and discussed in detail the inspection results listed below. The inspector informed the licensee that in view of an action item tracking commitment for resolving the inconsistency between the fire protection procedure and emergency classification procedure, this item would be reviewed during a subsequent inspection but not tracked as an IFI. Although information classified as proprietary was reviewed during the inspection, proprietary information is not contained in this report. There were no dissenting comments.

Item Number	Description/Reference
50-321, 366/90-01-01	NCV - Failure to properly classify an event in accordance with the classification Procedure 73EP-EIP-001-0S (Paragraph 5).

Licensee management was informed that two previous open items (listed in Paragraph 8) were reviewed and one item was considered closed, and one remains opened pending further actions.