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September 7, 1982



Georgia Power

the southern electric system

22 SEP 8 P 1: 51
J. T. Bechtel, 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
82-19

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

The following information is submitted in response to I&E Inspection Report 50-321/82-19 and 50-366/82-19.

VIOLATION:

Technical Specification 3.10.B requires that fuel shall not be loaded into the reactor core unless all control rods are fully inserted.

Contrary to the above, fuel was loaded into the core without all control rods fully inserted on two occasions:

1. Twenty-two (22) fuel bundles were loaded on June 16, 1982, with control rod 10-23 withdrawn.
2. Two (2) fuel bundles were loaded on June 17, 1982, with control rod 10-31 withdrawn.

This is a Severity Level IV Violation.

RESPONSE:

Admission or denial of violation: The violation occurred.

Reason for violation: After having removed adjacent fuel bundles, control rod 10-23 was withdrawn on May 15, 1982, to allow removal of the fuel support piece from that cell and subsequent removal of the control rod for inspection. (Note: We have determined it desirable to inspect a control rod for possible deleterious effects resulting from the chemical intrusion event that occurred on April 24, 1982.) When removal of the fuel support piece proved unsuccessful, refueling personnel decided to continue reloading fuel in other areas of the reactor core. Refueling personnel on the refueling floor and in the control room reviewed the Technical Specifications. Their attention was centered on Technical Specifications regarding Control Rod Maintenance

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rather than general refueling Technical Specifications. Consequently, due to this oversight, plant personnel incorrectly determined that reloading fuel with the control rod withdrawn was permissible. Twenty-two fuel bundles were then loaded into the core. On May 16, fuel loading was suspended to perform a required Technical Specification surveillance. At that time a decision was made to try to remove a different control rod since removal of the fuel support piece on control rod 10-23 was unsuccessful. Control rod 10-23 was inserted and control rod 10-31 was withdrawn in an attempt to remove the blade. (The fuel bundles surrounding 10-31 were previously removed.) This attempt was also unsuccessful. When the Technical Specification surveillance was completed, fuel reloading resumed. Two more fuel bundles were loaded with control rod 10-31 withdrawn before operations personnel determined that this was in violation of Technical Specifications and suspended fuel movement.

Corrective steps which have been taken and the results achieved: On May 17, 1982, fuel movement was suspended and all control rods were fully inserted. The Operations Superintendent reviewed with the Shift Foreman and Shift Supervisor on duty the Technical Specification requirements for fuel loading to assure compliance. A revision of "CONTROL ROD INSTALLATION AND REMOVAL" procedure, HNP-1-9305, was initiated to strengthen checks to assure compliance. The Plant Manager suspended use of the refueling bridge for fuel movement and required a subclearance in his name until such time as he felt that adequate, revised procedural controls existed, and that refueling personnel had been adequately retrained regarding fuel movement requirements.

Corrective steps that will be taken to avoid further violations: Procedures HNP-1-9302 and HNP-2-9302, "FUEL MOVEMENT OPERATION", are being revised to include tighter controls on changes to fuel movement data packages. Also, included in the revision is a requirement for each on-coming refueling floor SRO to sign off a data package of all refueling Technical Specification requirements in order to ensure adherence to those requirements.

Procedures HNP-1-9305 and HNP-2-9305, "CONTROL ROD INSTALLATION AND REMOVAL", are being revised to include a caution which states that no fuel may be loaded into the core unless all control rods are fully inserted. Further, a new data package will be added to these procedures to require a sign off by a licensed operator after any control rod or control rod drive work, thus assuring that all control rods are fully inserted. This data package must be completed before any fuel may be loaded into the core.

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A new administrative procedure HNP-34, "RULES FOR PERFORMING PROCEDURES," gives directions for backing out of a procedure which cannot be completed for any reason. Standing Order 82-23, issued July 22, 1982, specifies tighter controls on changes to procedures which address core alterations and eliminates the ability to make SRO changes to those procedures.

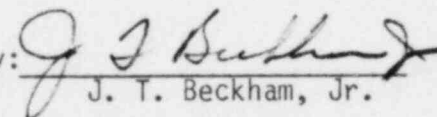
All procedures involving core alterations are being revised to include the steps necessary to preclude a recurrence of this event. Since this event cannot occur with the reactor vessel head in place, these procedures will be revised before the next core alteration occurs (i.e., refueling outage, on each unit). Thus, Unit 1 procedures will be completed by October 1, 1982, and Unit 2 procedures will be completed by January 1, 1983.

The date when full compliance will be achieved: Full compliance was achieved on May 17, 1982.

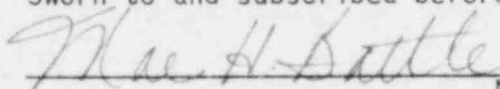
If you have any comments or questions regarding this response to I&E Inspection Report 82-19, please contact this office.

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 7th day of September, 1982



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

Notary Public

DLT/mb

Enclosure

xc: H. C. Nix
R. F. Rogers, III