ENCLOSURE 1

NOTICE OF VIOLATION

Georgia Power Company Hatch 1 and 2 Docket Nos. 50-321 and 50-366 License Nos. DPR-57, NPF-7

During an NRC inspection conducted January 10 through February 25, 1994, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

1. 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

General maintenance procedure 51GM-MNT-033-0S, Torquing Procedure, step 7.3.3.1, requires study to be at least flush with the nut head.

Administrative control procedure 20AC-BLD-001-0S, "Plant Housekeeping and Cleanliness Control," section 8, requires work areas be cleaned; materials and debris safely placed.

Contrary to the above:

- a. As of February 25, 1994, activities affecting quality were not adequately prescribed in that System Operating Procedure 34SO-G41-003-2S, "Fuel Pool Cooling and Cleanup System," valve lineup sheet incorrectly indicated valve 2G41-F040 was open and valve 2G41-F001 was locked closed. However, the design document, drawing P&ID H-26039, indicated the valves were closed and unlocked closed respectively. The actual positions of the valves were consistent with the design document.
- b. As of February 11, 1994, activities affecting quality were not adequately prescribed in procedures in that:
 - the procedures used to determine the ability of the Residual Heat Removal, Emergency Diesel Generator, and Control Room Heating Ventilation and Air Conditioning heat exchangers to perform their safety-related, heat transfer function provided inadequate guidance for inspection and documentation of the as-found and asleft conditions.
 - the procedure for visually inspecting the Residual Heat Removal heat exchanger provided inspection instructions for horizontal instead of vertically mounted heat exchangers.

- the procedure for cleaning the Residual Heat Removal heat exchanger tubes with air did not specify the pressure, volume, quality, or source of the air to be used.
- the quality control hold point to perform a visual inspection of the "as-found" condition of the heat exchanger internals occurred after the tubes were to be cleaned which defeated the intent of the hold point.
- c. As of February 11, 1994, activities affecting quality prescribed by documented procedures were not accomplished in a cordance with these procedures in that numerous Plant Service Water flanged piping connections in the intake structure had study less than flush with the accompanying nut.
- d. As of February 4, 1994, activities affecting quality prescribed by documented procedures were not accomplished in accordance with these procedures in that debris and/or excess loose scale materials were present in the lower portion of the service water intake structure and around the control room condenser units.

This is a Severity Level IV violation (Supplement I).

 10 CFR 50, Appendix B, Criterion XVI, "Corrective Actions," requires in part, that measures be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

Contrary to the above:

- a. Between December 6, 1993, and January 20, 1994, a condition adverse to quality was not promptly identified in that licensee personnel had information indicating that the Unit 1 Plant Service Water turbine isolation valves would not have enough motive force to fully close and did not initiate a condition adverse to quality report.
- b. As of February 11, 1994, a condition adverse to quality was not promptly corrected in that intake structure sediment inspections of November 1993 documented 7 of the 10 samples above the acceptable sediment depth of 12 inches, and the sediment was not scheduled to be removed until approximately 6 months after the condition was identified.

This is a Severity Level IV violation (Supplement I).

3. 10 CFR 50.73 requires in part, that licensees report within 30 days "Any event or condition that resulted in the condition of the nuclear power plant, including its principle safety barriers, being seriously degraded, or that resulted in the nuclear power plant being: ...In a condition that was outside the design basis of the plant..."

Final Safety Analysis Report, section 9.2.7.3, requires the tube side of the Residual Heat Removal heat exchanger be maintained above the shell side inlet, thereby preventing reactor water leakage into the river water in the event of a tube leak.

Contrary to the above, in 1986 the licensee failed to report within 30 days a condition outside the design basis of the plant in that the licensee identified on five separate occasions that the pressure on the tube side of the Residual Heat Removal heat exchanger could not be maintained above the pressure on the shell side inlet for the full regime of required design conditions.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Georgia Power Company is hereby required to submit a written statement or explanation to the U. S. Nuclear Regulatory Commission for items 1, 2, and 3, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II and a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice of Violation. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved.

If an adequate reply is not received in the time specified in this Notice, an order or demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Atlanta, Georgia this <u>22</u> day of <u>March</u>, 1994