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REGION II  
ATLANTA, GEORGIA

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Georgia Power

the southern electric system

Power Generation Department

September 27, 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  
Inspection Report Nos.  
50-321/82-24 and  
50-366/82-22

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

Georgia Power Company (GPC) offers the following in response to NRC Inspection Report 50-321/82-24 and 50-366/82-22 dated August 23, 1982, concerning the Notice of Violation for Plant Hatch Units 1 and 2. The alleged violations were discussed by representatives of Georgia Power Company and members of your staff during a meeting held at Region II offices on September 22, 1982.

#### VIOLATION A

10 CFR 55 Appendix A Sections 1 and 2 and the licensee's operator requalification program, HNP-200, Licensed Plant Personnel Training and Retraining, Section C.1, require a planned lecture series to be presented annually covering those subjects where annual written examinations indicate a need for additional training. The lecture series shall be scheduled for a minimum of 80 hours each year with a normal spread of 20 hours lecture per quarter.

Contrary to the above, a planned lecture series to be presented annually has not been developed covering those subjects where annual written examinations indicate a need for additional training. In addition, a schedule has not been developed identifying when the lectures are to be presented during the annual requalification program to assure presenting a minimum of 80 hours each year with a normal spread of 20 hours of lecture each quarter.

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

#### RESPONSE TO VIOLATION A

Admission or denial of alleged violation: The violation occurred in that GPC did not prepare a written preplanned lecture series and schedule for those subjects where annual written examinations indicated a need for additional training. However, GPC did present lecture series which emphasized the necessary subjects and included at least the minimum hours.

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RESPONSE TO VIOLATION A (Continued)

Reason for the alleged violation: GPC's interpretation of the regulatory requirements differed from that of the NRC inasmuch as our program did not rely on an annually revised written lecture series based on the results of the annual written examinations. GPC submits the following additional information concerning the violation: The Plant Hatch licensed operator requalification program is conducted for a continuous period with preplanned lectures being presented successively. Annual written examinations are administered on a continuing basis throughout the year, necessitating a frequent review of examination results to determine which areas need emphasis. The Plant Hatch Training Department has and will continue to review examination results to modify and schedule lectures to provide the necessary additional training. On this basis, problem areas can be given more immediate attention than if the lecture series were established once-per-year. An indepth review of past practices would demonstrate that the lecture series actually presented did in fact emphasize those areas in which annual written exams indicated the need. GPC has conducted, and is continuing to conduct, the necessary licensed operator training. The preplanning for the lecture series considers schedule requirements, recent Plant Hatch experience, industry experience, and annual requalification weakness.

Corrective steps which have been taken: A written, planned lecture series and schedule for 1982 have now been prepared and will be periodically reviewed and revised as necessary to integrate into the Plant Hatch training program the need for additional training based on the results of annual written examinations and other factors.

Corrective steps which will be taken to avoid further violations: In January, 1983 and annually thereafter, a written plan will be prepared to schedule and integrate the lecture series to meet all training requirements, including those identified above. GPC may modify this plan as needed.

Date of full compliance: Full compliance was achieved on September 17, 1982.

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VIOLATION B

10 CFR 50 Appendix B Criterion II and the accepted Quality Assurance Program, FSAR Section 17.2.2.4, require that non-QA Department personnel will receive QA indoctrination which includes QA policies and procedures. In addition to this indoctrination, plant operators, maintenance personnel, test personnel, quality control, and health physics personnel will receive specialized instruction in their areas of QA program implementation.

1. Contrary to the above, QA indoctrination is not being provided for all non-QA Department personnel in that temporary and service personnel (non-permanent plant employees) do not receive training in QA policies and procedures applicable to the services they provide.
2. Contrary to the above, a program has not been established which provides plant operators, maintenance personnel, test personnel, quality control, and health physics personnel specialized instruction in their areas of QA program implementation.

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

RESPONSE TO VIOLATION B

Admission or denial of alleged violation: The violation occurred.

Reason for the alleged violation: GPC's QA program requires that contractor personnel (performing activities affecting quality) be trained in QA policies and procedures. However, in at least one instance GPC or its contractor failed to conduct the required QA training. Further, although a specialized QA training program for GPC site employees was being developed, due to an oversight, the program was not implemented.

Corrective steps which have been taken: GPC has prepared to conduct both specialized QA training and contractor QA training.

Corrective steps which will be taken to avoid further violations: Implementing the preceding will prevent further violations--additional action is not required.

RESPONSE TO VIOLATION B (Continued)

Date of full compliance: On or before September 30, 1982, a program providing QA indoctrination for non-QA Department personnel, as well as specialized instruction for GPC personnel, will be established. This indoctrination and specialized instruction will occur during regular new employee training and employee retraining. Completion of the subject training may require a period of months; however, it will not extend beyond October 1, 1983.

Very truly yours,

*L. T. Gucwa*

L. T. Gucwa  
Chief Nuclear Engineer

GB/mb

xc: J. T. Beckham, Jr.  
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