



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA ST., N.W., SUITE 3100
 ATLANTA, GEORGIA 30303

Report Nos. 50-321/82-24 and 50-366/82-22

Licensee: Georgia Power Company
 P. O. Box 4545
 Atlanta, GA 30302

Facility Name: Hatch 1 and 2

Docket Nos. 50-321 and 50-366

License Nos. DPR-57 and NPF-5

Inspection at Hatch site near Baxley, Georgia

Inspectors: <u><i>P. H. Skinner</i></u> P. H. Skinner	<u><i>Aug. 19, 1982</i></u> Date Signed
<u><i>L. H. Jackson</i></u> L. H. Jackson	<u><i>Aug. 19, 1982</i></u> Date Signed
Approved by: <u><i>C. M. Upright</i></u> C. M. Upright, Section Chief Engineering Inspection Branch Division of Engineering and Technical Programs	<u><i>8/19/82</i></u> Date Signed

SUMMARY

Inspection on July 26-30, 1982

Areas Inspected

This routine, unannounced inspection involved 68 inspector-hours on site in the areas of calibration, maintenance, surveillance, organization and administration, non-licensed training, and requalification training.

Results

Of the six areas inspected, no violations or deviations were identified in four areas; two violations were found in two areas (Failure to provide QA indoctrination, paragraph 9.a.; and failure to provide a scheduled preplanned lecture series based on evaluation of annual licensed operator written examinations, paragraph 10).

REPORT DETAILS

1. Persons Contacted

Licensee Employees

- S. Barr, Maintenance Foreman
- J. Beck, Maintenance Foreman
- *C. Belflower, QA Site Supervisor
- J. Bray, QA Field Representative
- J. Dawson, Maintenance Supervisor
- H. Dwyer, Operations Supervisor
- T. Elton, Engineering Supervisor Regulatory Compliance
- *P. Fornel, Assistant QA Site Supervisor
- *T. Greene, Assistant Plant Manager
- E. Henry, Instrumentation and Control Foreman
- J. Lewis, Operations Supervisor
- *C. Miles, Jr., QA Field Supervisor
- *D. Moore, Superintendent Nuclear Training
- *D. McCusker, Quality Control Supervisor
- *R. Nix, Superintendent Maintenance
- *W. Thigpen, Senior QA Field Representative

Other licensee employees contacted included technicians, operators, mechanics, security, and office personnel.

NRC Resident Inspector

- *P. Holmes-Ray

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on July 30, 1982, with those persons indicated in paragraph 1 above. The licensee acknowledged the following inspection findings:

Violation 321/82-24-01, 366/82-22-01, Failure to provide QA indoctrination.

Violation 321/82-24-02, 366/82-22-02, Failure to provide a scheduled preplanned lecture series based on evaluation of annual licensed operator examinations.

Inspector Followup 321/82-24-03, 366/82-22-03, Correction of weaknesses in the general employee training program.

Inspector Followup Items 321/82-24-04, 366/82-22-04, Identify all functional testing required as a result of maintenance.

3. Licensee Action on Previous Inspection Findings

Not inspected.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Calibration (56700)

Reference: (a) HNP-832, Calibration Program for Instrumentation not covered by Technical Specification, Revision 18

(b) HNP-2-3963M, Drywell Equipment Drain Sump Flow Instrument Functional Test and Calibration (FT&C), Revision 3

(c) HNP-2-3964M, Drywell Floor Drains Sump Flow Instrument FT&C, Revision 5

(d) HNP-1-3282, Plant Service Water Pump Inservice Test, Revision 9

The inspector verified that selected instruments and measurement and test equipment had been calibrated as identified in procedures (b) through (d).

Instruments used while performing work on sixteen valves and three pump maintenance requests were selected to verify that documentation of calibration was complete, acceptance criteria was met, frequency of calibration specified in Technical Specifications was being met, calibration data was being reviewed and approved, personnel were qualified, "as found" and "as left" conditions were being recorded, and documentation was retrievable.

The inspector reviewed reference (a) which identified specific components and frequency of calibration of those components associated with safety related systems or functions but are not specifically identified by Technical Specifications as requiring calibration.

Within this area, no violations or deviations were identified.

6. Maintenance (62700)

Reference: HNP-8, Maintenance Request, Revision 13

The inspector reviewed the licensee's maintenance program as described in the above reference. Maintenance requests (MR) were reviewed to verify that valves and pumps are being operability tested, procedures are being

followed, documentation of tests are available and complete, acceptance criteria is met, personnel performing maintenance are qualified, completed documentation is reviewed and approved, and documentation is retrievable.

The inspector selected sixteen maintenance requests for valves and three maintenance requests for pumps for this verification.

Within this area, one inspector followup item was identified. HNP-8, paragraph 14, requires the department responsible for the functional test to assign a functional test upon receipt of the MR, if required, and reference any procedures to be used for the functional test.

On two MRs the functional test was not specified and on five additional MRs all functional tests required were not specified.

Discussions with the Maintenance Superintendent identified that this deficiency had been previously identified by the Plant Review Board (PRB) and the PRB has appointed a committee to investigate and recommend measures to be taken to preclude inadvertent bypassing of required tests. The licensee committed to revising HNP-8 or other administrative procedures as necessary by November 1, 1982, to correct this deficiency. This action will be tracked as inspector followup item (321/82-24-04, and 366/82-22-04) pending review of the corrective action during a subsequent inspection.

7. Surveillance (61700)

- Reference:
- (a) HNP-2-3963M, Drywell Equipment Drain Sump Flow Instrument Functional Test and Calibration (FT&C), Revision 3
 - (b) HNP-2-3964M, Drywell Floor Drains Sump Flow Instrument FT&C, Revision 5
 - (c) HNP-1-3182, Plant Service Water Pump Inservice Test, Revision 9

The inspector verified that selected surveillances and calibrations are being performed as required by Technical Specifications and procedures (a) through (c). The inspector reviewed data to assure the required frequencies are being met, data met the required acceptance criteria, personnel were qualified to perform the surveillance, calibrated test equipment was used, proper corrective action was taken when items were found out of acceptable limits, data had been reviewed and approved, and data was retrievable.

The inspector selected instrumentation associated with the Drywell Equipment Drain Sump to verify surveillances were performed monthly for the last six months and calibrations were verified or performed every three months as required by Technical Specifications.

Within this area, no violations or deviations were identified.

8. Organization and Administration (36700)

- References: (a) Technical Specifications, Section 6.3, Unit Staff Qualifications
- (b) HNP-1, Plant Organization Staff Responsibilities and Authorities, Revision 15

The inspector reviewed the qualifications of various personnel within the onsite organization to assure they met requirements of references (a) and (b).

The following positions and persons assigned to the positions were reviewed:

Assistant Plant Manager	C. T. Jones
HP Superintendent	W. H. Rogers
Superintendent Operations	S. Baxley
Superintendent Maintenance	R. Nix
Quality Control Supervisor	D. McCusker
Shift Foreman	B. E. Butler
Assistant Plant Operator	C. R. Riddle
I&C Foreman	J. W. Blizzard
Shift Technical Advisor	S. Curtis
Engineering Supervisor	R. Gliason
Chemist	R. L. Legend
Plant Equipment Operator	L. W. Swinson, Jr.
HP Technician	G. I. Cummings
Maintenance Foreman	J. R. Beck

Within this area, no violations or deviations were identified.

9. Training (41700)

- References:
- (a) Accepted Quality Assurance Program, FSAR Chapter 17.2
 - (b) Technical Specifications, Section 6.0, Administrative Controls
 - (c) HNP-19, Orientation of New Personnel, Revision 12
 - (d) HNP-203, General Employee Training, Revision 5
 - (e) HNP-204, Documentation of ANSI Maintenance Training, Revision 4
 - (f) HNP-206, Non-Licensed Departmental Training, Revision 5

The inspector reviewed the training program which provides the required training for the facility staff personnel. This program was reviewed to verify that it complies with requirements contained in references (a) through (f) above; the program covers training in the areas of administrative controls and procedures, radiological health and safety, industrial safety, security procedures, emergency plan, quality assurance training, and prenatal radiation exposure training for females; nonlicensed operators are trained in functions which they perform; and related technical and on-the-job training is provided to applicable personnel, where required. The plant specialty group training programs, references (e) and (f), were reviewed to determine if formal technical training commensurate with the job classifications was being provided. The inspector reviewed training records of about 40 plant personnel.

Within this area, one violation discussed in paragraph 9.a and one inspector followup item discussed in paragraph 9.b were identified.

a. Failure to Provide QA Indoctrination

Reference (a) paragraph 17.2.2.4 specifies 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, QC, and health physics personnel will receive specialized instruction in their areas of QA program implementation. Discussions with the Superintendent of Training, a Maintenance Supervisor, and QA personnel indicate that training in QA policies and procedures is not being provided to non-Georgia Power Company contract personnel. These individuals provide various plant services affecting quality such as engineering, health physics, and installation of design changes/modifications. In the area of specialized instruction discussed above, the inspector determined, based on

discussion with the QA personnel, that a program was initiated to accomplish the specialized training but agreement could not be reached as to what training should be presented. As a result of this failure to reach an agreement, the program was not developed and has not been provided as required. This failure to provide QA indoctrination to all personnel whose activities affect quality and the lack of specialized training required by reference (a) constitute a violation (321/82-24-01, 366/82-22-01).

b. Weaknesses in Presentation of Training Material During General Employee Training

The inspector attended the General Employee Training class and although the presentation as a whole was adequate, the following weaknesses were observed and discussed with the Training Supervisor:

- (1) The training area size was not sufficient for the number of personnel attending the training class.
- (2) The board could not be seen from all trailer locations.
- (3) The instructor incorrectly stated the human body attracts neutrons.
- (4) No visual examples of TLD's and dosimeters were provided.
- (5) The instructor stated "come out of area when dosimeter indicates between 150 to 200 mrem".
- (6) The instructor stated that a high range dosimeter existed that reads greater than 200 mr/hr.
- (7) Several questions on the examination were not covered in the presentation.
- (8) Regulatory Guide 8.13 requirements were discussed primarily with the female class attendees during a break, rather than in detail with all personnel in the classroom.
- (9) No mechanism was provided to minimize the possibility of potential cheating on the quiz since space was inadequate.
- (10) Donning and removal of anti-contamination clothing was shown incorrectly in the film presented. Although the instructor pointed out the errors, it is poor practice to show an incorrect method to accomplish a task.

- (11) The practical factor of removal of anti-contamination clothing and performing frisking was poor in that one person was trying to monitor two persons removing clothing and two frisking out at any one time. Very few trainees performed the entire process correctly, but all were signed off as acceptable.

The Superintendent of Training stated he would look into these areas. These weaknesses in the General Employee Training program collectively constitute an inspector followup item (321/82-24-03, 366/82-22-03) and will be reviewed during a subsequent inspection.

10. Requalification Training (41701)

- References:
- (a) Technical Specifications, Section 6.4, Training
 - (b) 10 CRR 55, Appendix A, Requalification Program for Licensed Operators of Production and Utilization facilities
 - (c) HNP-200, Licensed Plant Personnel Training and Retraining, Revision 7

The inspector reviewed the requalification program to determine conformance to references (a) through (c). The inspector reviewed the following areas: retraining conducted in 1981 and to date in 1982; annual written examinations and the individual's responses; documentation of required control manipulations; schedule for conducting lectures and prepared lesson plans; and participation in accelerated training program when applicable. The training records of ten licensed operators were reviewed.

Within this area, one violation was identified. Reference (b), Sections 1 and 2 require a scheduled program which includes preplanned lectures on a regular and continuing basis throughout the license period in those areas where annual licensed operator examinations indicate additional training is required. The operator requalification program which is provided in reference (c) implements this requirement in Section C.1. Section C.1 states also that the lecture series shall be scheduled for a minimum of 80 hours each year, with a normal spread of 20 hours of lectures per quarter. Discussion with the Superintendent of Training indicated that no schedule for the requalification lecture series had been established and an evaluation of all annual written examinations on which to base this lecture series has not been performed. The Superintendent of Training does review an individual's exam and determines on an individual basis the retraining for that person, if required. This failure to provide a scheduled preplanned lecture series based on evaluation of annual written examination results is a violation (321/82-24-02, 366/82-22-02).