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December 10, 1990

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
RESPONSE TO INSPECTION REPORT 90-16

Gentlemen:

In response to your letter of November 7, 1990, Georgia Power Company (GPC) is providing the enclosed response to NRC Inspection Report 90-16. Although the inspection report did not contain any Notice of Violations, responses to several inspector followup items (IFIs) were requested.

The enclosure to this letter provides a summary of each IFI and GPC's response to each item. A copy of this response is being provided to NRC Region II for review.

Should you have questions in this regard, please contact this office.

Sincerely,


W. G. Hairston, III

GKM/sp

Enclosure: Inspection Report 90-16 and GPC Response

c: (See next page.)

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Page Two

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Mr. H. L. Sumner, General Manager - Nuclear Plant
Mr. J. D. Heidt, Manager Engineering and Licensing - Hatch
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ENCLOSURE

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
INSPECTION REPORT 90-16 AND GPC RESPONSE

SUMMARY OF INSPECTION REPORT 90-16

By letter dated November 7, 1990, Georgia Power Company (GPC) received NRC Inspection Report Nos. 50-321/90-16 and 50-366/90-16. The subject inspection was a special announced Emergency Operating Procedure (EOP) followup team inspection to verify the adequacy of corrective actions for previous findings in the area of EOPs and Abnormal Operating Procedures (AOPs). As a result of the inspection, deficiencies were identified with equipment labeling, and EOP setpoints and technical content. By the same letter, the NRC requested GPC respond to these items with plans and a schedule for corrective actions. The following is GPC's response to that request.

RESPONSE TO INSPECTION REPORT 90-16

Inspector Followup Item 90-16-01

This item concerns apparent deficiencies in equipment labeling. Specific examples are given in Appendix B of the inspection report.

GPC reviewed and evaluated the Appendix B examples, in addition to walking down the Unit 1 and Unit 2 EOP supplemental procedures, to determine whether additional labeling deficiencies existed. Although the equipment was labeled, some procedural changes were determined to be necessary to improve the terminology. The changes required to EOPs, as determined by the walkdown, were incorporated into revisions effective 11/9/90. Several of the Appendix B examples determined by GPC to be problems were also corrected by revisions effective 11/9/90. Problems noted in Appendix B items II.6.a and II.10.a will be corrected with revisions to procedures 31EO-EOP-103-2S, "EOP Control Rod Insertion Methods," and 31EO-EOP-108-2S, "Alternate RPV Depressurization," respectively. These revisions will become effective by 12/28/90. The labels noted in item II.6.b have been removed.

The approved Plant Hatch Writer's Guide WG-11, "EOP Writer's Guide," section 2.7(1), allows the use of common operation terminology to identify equipment under certain conditions in the interest of improving human factors. Accordingly, it should be noted that GPC's evaluation of the Appendix B items determined some were not problems. Specifically, items II.5.b, II.5.c, II.9.b, II.13.a, and part of II.14.a were determined to be in compliance with section 2.7(1) of the referenced writer's guide. GPC's review of the five listed examples indicates equipment identification is appropriate and allowed; therefore, no changes will be made.

ENCLOSURE (Continued)

INSPECTION REPORT 90-16 AND GPC RESPONSE

Inspector Followup Item 90-16-C2

This item concerns apparent inconsistencies among setpoints in various plant documents and the EOPs. Specific examples are given in Appendix B of the inspection report.

GPC reviewed and evaluated the Appendix B examples and determined items II.3.b and II.3.c do not represent inconsistencies. The setpoints for high drywell pressure and high primary containment hydrogen concentration, as given in the EOPs and Plant Specific Technical Guideline (PSTG), do not deviate from the BWROG Emergency Procedure Guidelines (EPGs). Revision 4 of the EPG (NEDO-31331) states that brackets enclose setpoints to be provided by the plant, i.e., plant-unique setpoints, and parentheses within brackets indicate the source for the bracketed variable. It further states that included in the brackets for illustrative purposes are typical setpoints.

The numbers for drywell pressure and hydrogen concentration are listed in brackets in the EPG; therefore, the numbers provided are typical, and each plant is expected to provide plant-unique numbers in its PSTG and EOPs. This was done for Plant Hatch; consequently, Hatch has not deviated from the EPG. The other examples were determined to represent actual setpoint inconsistencies.

Procedures 31EO-EOP-014-1S and 31EO-EOP-014-2S, "Secondary Containment Control, Radioactive Release Control," will be revised by 12/28/90 to correct the problems noted in Appendix B. Additionally, a complete review of instrument and operator action setpoints in the EOPs will be performed by 12/10/90. If more problems are found, the affected EOPs will be revised.

Finally, GPC will review the present setpoint maintenance program by 12/14/90 to determine whether it is adequate to ensure setpoint changes are reviewed for impact on the EOPs. Changes will be made to the program if determined necessary by the review.

It should be noted that the NRC resident inspectors recently performed a brief overview audit of setpoint controls as a result of IFI 90-16-02. The inspectors selected a random sample of setpoints used in the Control Room Alarm Response Procedures (ARPs) and reviewed several calibration procedures. The inspection indicated the overall plant setpoint controls program is adequate and effective. NRC Inspection Report 90-02, page 8, dated November 14, 1990, provides documentation of the overview audit.

ENCLOSURE (Continued)

INSPECTION REPORT 90-16 AND GPC RESPONSE

Inspector Followup Item 90-16-03

This item concerns apparent technical inconsistencies in some of the EOPs. Specific examples are given in Appendix B of the inspection report.

GPC reviewed and evaluated the Appendix B examples. Some of the examples were corrected by procedure revisions effective 11/9/90. The remaining examples associated with this IFI are addressed below.

Procedure 34AB-OPS-002-2S, "Small Pipe Break Inside Primary Containment and RPV Water Level Corrections," will be revised by 12/14/90 to correct the identified typographical error. Procedures 34SO-E11-010-1S and 34SO-E11-010-2S, "Residual Heat Removal System," and 34SO-E21-001-1S and 34SO-E21-001-2S, "Core Spray System," will be revised by 2/1/91 to address item II.3.d. Procedures 31EO-EOP-014-1S and 31EO-EOP-014-2S will be revised by 12/22/90 to address item II.4.a. Procedure 34IT-EOP-001-0S, "EOP Equipment Checks," will be revised by 1/4/91 to address item II.5.d. Procedures 34SO-E51-001-1S and 34SO-E51-001-2S, "Reactor Core Isolation Cooling System;" 34SO-E41-001-1S and 34SO-E41-001-2S, "High Pressure Coolant Injection System;" and 34SO-C11-001-1S and 34SO-C11-001-2S, "Control Rod Drive Hydraulic System," will be revised by 1/12/91 to address items II.11.f through II.11.j.

Additionally, the comments relative to procedures 31EO-EOP-109-1S and 31EO-EOP-109-2S, "Alternate Boron Injection," will be evaluated by 12/14/90. If the evaluation indicates changes are necessary, the procedures will be revised. Likewise, the comments relative to the Residual Heat Removal, Core Spray, and Primary Containment Atmosphere Hydrogen and Oxygen Analyzer System operating procedures will be evaluated by 2/1/91. If the evaluation indicates changes are necessary, the affected procedures will be revised.

Finally, the EPG/PSTG deviation justification document will be revised by 1/18/91 to address item II.3.a, and the difference between "available suppression pool cooling" and "ALL available suppression pool cooling" will be supplied to Training by 12/21/90 to address item II.3.e.