

Georgia Power Company  
333 Piedmont Avenue  
Atlanta, Georgia 30308  
Telephone 404 526-3195

Mailing Address  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201  
Telephone 205 868-5581

the southern electric system

W. G. Hairston, III  
Senior Vice President  
Nuclear Operations

HL-1402  
00099

December 19, 1990

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

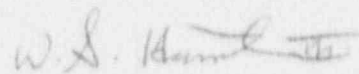
PLANT HATCH - UNIT 2  
NRC DOCKET 50-366  
OPERATING LICENSE NPF-5  
RESPONSE TO INSPECTION REPORT 90-23

Gentlemen:

In response to your letter of November 30, 1990 and in accordance with the provisions of 10 CFR 2.201, Georgia Power Company (GPC) is providing the enclosed response to the Notice of Violation associated with NRC Inspection Report 90-23. A copy of the response is being provided to NRC Region II for review. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Should you have any questions in this regard, contact this office at any time.

Sincerely,



W. G. Hairston, III

JKB/rw

Enclosure:

c: (See next page.)

IEO  
11

U.S. Nuclear Regulatory Commission  
December 19, 1990  
Page Two

c: Georgia Power Company  
Mr. H. L. Sumner, General Manager - Nuclear Plant  
Mr. J. D. Heidt, Manager Engineering and Licensing - Hatch  
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.  
Mr. K. Jabbour, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II  
Mr. S. D. Ebnetter, Regional Administrator  
Mr. L. D. Wert, Senior Resident Inspector - Hatch

ENCLOSURE 1

PLANT HATCH - UNIT 2  
NRC DOCKET 50-366  
OPERATING LICENSE NPF-5  
VIOLATION 90-23-01 AND GPC RESPONSE

VIOLATION 90-23-01

Hatch Unit 2 Technical Specification 3.4.3.1 requires that with either the primary containment atmosphere particulate radioactivity monitoring system or the primary containment gaseous radioactivity monitoring system inoperable, operation may continue for up to 30 days provided grab samples of the containment atmosphere are obtained and analyzed at least once per 4 hours.

Contrary to the above, the Unit Two particulate monitoring system was inoperable from approximately 0515 to 1530 on November 5, 1990 without the required grab samples being obtained.

This is a Severity Level IV violation. (Supplement 1)

RESPONSE TO VIOLATION 90-23-01

Admission or denial of violation:

The violation occurred as described in the Notice of Violation.

Reason for the violation:

The violation was caused by less than adequate procedures and personnel error. Procedure 64CH-CAM-005-05, "Fission Product Monitors," did not list switch 2D11-P011-HS2 in the system lineup for panel 2D11-P011. The adjacent panel, 2D11-P010, is part of the same Fission Product Monitor (FPM) system and also has a switch labeled "HS2." The switch on panel 2D11-P010 is listed in procedure 64CH-CAM-005-05 and is normally in the off position when the FPM system is in operation. The apparent similarity between the two panels led the chemistry technician not to question the undesignated switch being in the off position or its omission from the system lineup. Moreover, the HS2 switch on panel 2D11-P011 is not normally manipulated by Chemistry Department personnel; thus, its incorrect position was not conspicuous to the technician. Consequently, switch 2D11-P011-HS2 was left in the off position thereby rendering the Particulate Monitoring subsystem of the FPM system inoperable.

ENCLOSURE 1 (CONTINUED)

VIOLATION 90-23-01 AND GPC RESPONSE

The Annunciator Response Procedure 34AR-602-430-2S, "Fission Product Flow High/Low," did not list all the possible causes of annunciator "Fission Product Flow High/Low." Switch 2D11-P011-HS2, which supplies power to the Particulate Monitoring subsystem's filter paper drive motor, has several functions, one of which is to illuminate the flow annunciator under certain conditions. This potential annunciator cause was omitted from the procedure, thus leading Operations personnel to the false conclusion that all causes for a valid annunciator had been investigated and eliminated and that the annunciator was spurious. (The cause for the annunciator was eventually determined via reviews of elementary drawings and system manuals and by panel walkdowns.) The Unit 2 Shift Supervisor, having been erroneously assured that the annunciator was spurious, terminated the Limiting Condition for Operation and the compensatory actions required by the Technical Specifications, i.e., the four-hour grab samples.

Finally, the Chemistry technician who performed the post-maintenance functional test on the Particulate Monitoring subsystem filter paper drive motor made a personnel error in performing the functional test, a check of the motion of the filter paper. The paper moves slowly so that twenty to thirty minutes are required in order to visually detect movement. The technician allowed approximately twenty-five minutes to elapse before checking for filter paper motion. The technician mistakenly believed that motion had occurred even though it had not. In fact, the power supply switch was in the off position and the paper could not have been advancing. The technician, then, incorrectly signed off the functional test as complete and satisfactory. This error, in conjunction with the aforementioned deficient procedures, misled personnel into regarding the flow annunciator as spurious and the Particulate Monitoring subsystem as operable.

Corrective steps which have been taken and the results achieved:

As a result of this event, the following actions have been taken:

1. The filter paper in the Particulate Monitoring subsystem was re-examined after the mispositioned switch was placed in the correct (on) position and the paper was determined to be advancing properly.
2. Procedure 64CH-CAM-005-0S was revised to incorporate the position of switches 1D11-P011-HS2 (the switch for the Unit 1 Particulate Monitoring subsystem) and 2D11-P011-HS2 in the system lineups. This revision was effective 11/20/90.
3. Procedure 34AR-602-430-2S was temporarily revised on 11/27/90 to include the position of switch 2D11-P011-HS2 in the list of possible causes for the flow annunciator. This temporary change will be made permanent by 12/21/90.

ENCLOSURE 1 (CONTINUED)

VIOLATION 90-23-01 AND GPC RESPONSE

4. The corresponding Unit 1 procedure, 34AR-650-313-1S, "Fission Product Flow High/Low," also was temporarily revised on 11/27/90 to include switch position as a possible cause for the annunciator. This temporary change will be made permanent by 12/21/90.
5. The individual responsible for the personnel error was counseled.

Corrective steps which will be taken to avoid further violations:

No further corrective actions are necessary to prevent recurrence.

Date when full compliance will be achieved:

Full compliance was achieved on 11/3/90 when switch 2D11-P011-HS2 was placed in the correct (on) position returning the FPM system to an operable status.