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NRG RECORD
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Georgia Power
the southern electric system

January 26, 1983

NED-83-057

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
101 Marietta Street, NW
Atlanta, Georgia 30303

REFERENCE:
RII: JPO
Inspection Report Nos.
50-321/82-38
50-366/82-36

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

The following information is submitted in response to I&E Inspection Report 50-321/82-38 and 50-366/82-36 concerning the inspection conducted by Mr. Frank Jape on November 16-19, 1982:

VIOLATION:

Technical Specification 6.8.1.C requires that licensee establish, implement and maintain written procedures which will adequately accomplish surveillance and test activities of safety related equipment. Technical Specification 6.8.2 requires that the procedures of 6.8.1.C will be reviewed by the PRB and approved by the plant manager prior to implementation and reviewed periodically.

Contrary to the above, HNP-1-3952-E, Revision 13, does not identify all valve positions associated with Type C leak rate tests. Also, an uncontrolled supplementary document, which is not a part of nor referenced in HNP-1-3952-E, is used to assist in identifying Type C test valve alignments.

This is a Severity Level IV Violation.

RESPONSE:

Admission or denial of alleged violation: The violation occurred as stated.

Reason for violation:

- A. It was felt that listing leak rate test boundary valves in the procedure in conjunction with qualified personnel performing the tests was adequate to insure implementation of the leak rate testing program.
- B. Since the uncontrolled supplementary document was used by qualified personnel in conjunction with controlled P&ID's (Piping and instrument Diagrams), it was felt that requirements were being adhered to.

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RESPONSE: (Continued)

Corrective steps which have been taken and the results achieved: In order to evaluate the validity of Type C leak rate tests performed in accordance with HNP-1-3952-E, the qualifications of personnel who performed these tests have been reviewed and found to be acceptable.

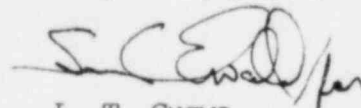
Corrective steps which will be taken to avoid future violations:

- A. The Unit 1 and Unit 2 leak rate test procedures, HNP-1-3952-E and HNP-2-3952-E "Primary Containment Periodic Type B & C Leakage Test", will be revised to prevent any possible problems in the future. The revised procedures will address the following: Valve positions for both the valve(s) being tested and any required blocking valve(s), venting requirements, and instrument error. The Leak Rate Test Log will be placed under the control of the records management department.
- B. The revised procedures, HNP-1-3952-E and HNP-2-3952-E will contain sufficient detailed information to perform Leak Rate Testing. Use of the supplementary document will be discontinued; however, some of the information currently contained in it will be incorporated into the aforementioned procedure revisions.

Date when full compliance will be achieved: A procedure revision to bring the Unit 1 procedure into full compliance will be submitted to the Plant Review Board (PRB) by March 1, 1983, and the Unit 2 procedure revision will be submitted to the PRB by April 1, 1983.

If you have any questions or need further information, please contact this office.

Very truly yours,



L. T. Gucwa
Chief Nuclear Engineer

SCE/mb

xc: J. T. Beckham, Jr.
H. C. Nix, Jr.
Senior Resident Inspector