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

Report Nos. 50-321/82-38 and 50-366/82-36

Licensee: Georgia Power Company

Facility Name: Hatch

Docket Nos. 50-321 and 50-366

License Nos. DPR-57 and NPF-5

Inspection at Hatch site near Baxley, Georgia

Inspector: Frank Jape for H. L. Whitener — 12/17/82 Date Signed

Approved by: Frank Jape — 12/17/82 Date Signed
F. Jape, Section Chief
Engineering Inspection Branch
Division of Engineering and Technical Programs

SUMMARY

Inspection on November 16-19, 1982

Areas Inspected

This routine, unannounced inspection involved 28 inspector-hours on site in the area of local leak rate testing.

Results

Of the area inspected, one apparent violation was found: (Inadequate local leak rate test procedure, 321/82-38-01).

REPORT DETAILS

1. Persons Contacted

   Licensee Employees

   H. Nix, Plant Manager
   *C. T. Jones, Assistant Plant Manager
   *T. V. Green, Assistant Plant Manager
   C. E. Belflower, QA Site Supervisor
   *P. E. Fornel, Jr., Assistant QA Site Supervisor
   *W. B. Thigpen, QA, Senior Field Representative
   *D. A. McCusker, QC Supervisor
   J. Hadden, QC Specialist
   *W. B. Kirkley, Engineer, LRT Coordinator

   NRC Resident Inspector

   *P. Holmes-Ray, Resident Inspector

   *Attended exit interview

2. Exit Interview

   The inspection scope and findings were summarized on November 19, 1982, with those persons indicated in paragraph 1 above. The licensee acknowledged the inspection findings delineated in this report. Actions being considered by the licensee in regard to violation 321/82-38-01 include to the following:

   a. Evaluate the validity of leak rate tests performed by HNP-1-3952-E.

   b. Revise HNP-1-3952-E as needed to incorporate sufficient valve information for leak rate tests.

   c. Evaluate Unit 2 leak rate test program and results relative to the findings on Unit 1.

3. Licensee Action on Previous Enforcement Matters

   Not inspected.

4. Unresolved Items

   Unresolved items were not identified during this inspection.

5. Local Leak Rate Testing (61719)

The inspector reviewed the Hatch Unit 1 program and procedure for conducting Type B and Type C leakage rate testing to determine that the periodic surveillance testing is performed in accordance with an approved, technically adequate procedure, which meets the requirements of Appendix J to 10 CFR 50, and applicable Technical Specifications.

a. Procedure Review

Review of HNP-1-3952-E, Revision 13, "Primary Containment Periodic Type B and Type C Leakage Tests", indicated certain inadequacies in the procedure. These items were identified and discussed with test and management personnel. Items identified included:

(1) Valve Alignments:

The procedure does not identify all valve positions necessary to perform an adequate leak rate test. Test connection and position of any valve which can affect the test must be specified to insure that no artificial barrier is erected. Isolation, draining and venting of piping adjacent to the isolation valve under test must be accomplished by specifying the position of block, vent and drain valves which insure the correct differential pressure is obtained across the isolation valve under test. The test procedure did not contain the level of detail to insure the above conditions.

(2) Uncontrolled Document:

During discussions of how valve alignment was identified and achieved for leak rate testing, the licensee produced a notebook which contained line diagrams of the penetrations. The inspector determined that the notebook containing penetration line drawings used to establish valve positions is not a part of the test procedure, is not referenced by the test procedure, and is not an approved, reviewed, controlled document. A detailed review of this document was not performed at this time.

(3) Test Status Log

Section H.3 of HNP-1-3952-E, Revision 13, requires that the Leak Rate Test (LRT) Coordinator maintain an up-to-date log which shows the status of test completion and leakage summation results. The inspector found that the LRT coordinator has maintained this log, however, the log is not included in the plant QA record system. This log is a part of the leakage test record and must be maintained in the plant record system.

(4) Other Comments on HNP-1-3952-E

During review of the test procedure, the inspector noted the following items which should be considered in the revision of the procedure:

(a) Description of test equipment does not state required instrument specifications. Instrument error must be considered when determining that acceptance criteria is met.

(b) Temperature of test media is not measured. Error in leakage measurement due to temperature difference from calibration temperature of rotometers must be considered when determining the error in the summation of leakages to compare to the acceptance criteria.

At the exit interview, the inspector stated that the licensee appeared to be in violation of the Technical Sepcifications as follows (Violation 321/82-38-01):

Technical Specification 6.8.1 requires that the licensee establish, implement and maintain written procedures which will adequately accomplish surveillance and test activities on safety related equipment.

Technical Specification 6.8.2 further requires that these procedures are reviewed by the PRB and approved by the Plant Manager prior to implementation and reviewed periodically.

Contrary to the above requirements, test procedure HNP-1-3952-E,-Revision 13, for performing Type C surveillance testing on primary containment isolation valves does not contain detailed valve positioning information to insure that all valves associated with the tests are properly positioned. Further, an uncontrolled document which is not a part of the test procedure is used to assist in determining proper valve positions.

Licensee management agreed to review the local leak rate test program. Actions being considered are verification of leak rate tests performed by the current test procedure and revision of the procedure as necessary to meet NRC requirements. Tests performed on Unit 2 will also be evaluated in the licensee's review.

t. Test Results

The inspector reviewed a sample of data packages. Except for the valve issue, no problems were identified. The licensee's summary status indicated that of 129 Type C tests, 70 are completed with 15 test failures identified.