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Vice President - Nuclear
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Georgia Power

the southern electric system

June 2, 1994

Docket No. 50-366

HL- 4608

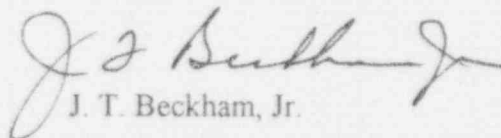
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Edwin I. Hatch Nuclear Plant - Unit 2
Reply to a Notice of Violation

Gentlemen:

In response to your letter dated May 12, 1994, and according to the requirements of 10 CFR 2.201, Georgia Power Company (GPC), is providing the enclosed response to the Notice of Violation associated with Inspection Report 94-08. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Sincerely,


J. T. Beckham, Jr.

JKB/JP/cr

Enclosure: Violation 94-08-01 and GPC Response

cc: Georgia Power Company

Mr. H. L. Sumner, Nuclear Plant General Manager
NORMS

U. S. Nuclear Regulatory Commission, Washington, D. C.

Mr. K. Jabbour, Licensing Project Manager - Hatch

U. S. Nuclear Regulatory Commission, Washington, D. C.

Mr. S. D. Ebnetter, Regional Administrator

Mr. L. D. Wert, Senior Resident Inspector - Hatch

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Enclosure

Edwin I. Hatch Nuclear Plant - Unit 2
Violation 94-08-01 and GPC Response

VIOLATION 94-08-01

Hatch Unit 2 Technical Specifications (TS) 6.8.1a require that written procedures be established, implemented, and maintained covering activities delineated in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978.

RG 1.33, Appendix A, "Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors," paragraph 2.1, recommends procedures for refueling and core alterations.

Procedure 42FH-ERP-014-0S: Fuel Movement, Section 7.2.1.3 (General Fuel Movements), steps 7.2.1.3.2, 7.2.1.3.4, and 7.2.1.3.5, require confirmations and double verification that the fuel bundle in a specified location is moved to a specified new location. Section 7.2.1.2 (Full Core Reload), steps 7.2.1.2.3.1, 7.2.1.2.5.1, and 7.2.1.2.5.3, require confirmations and double verification that the refueling platform is moved to the specified spent fuel pool location, and that the fuel bundle located in that specified location is moved to the new specified core location.

Procedure 34FH-OPS-001-0S: Fuel Movement Operation, steps 7.1.9 and 7.1.10 require confirmation that the grapple is securely attached to a fuel bundle prior to lifting.

Contrary to the above, written procedures were not implemented in that:

On March 30, 1994, during performance of Procedure 42FH-ERP-014-0S: Fuel Movement, steps 7.2.1.3.2, 7.2.1.3.4, and 7.2.1.3.5 were not completed. A fuel bundle other than that specified by the procedure was moved to the fuel preparation machine.

On April 15, 1994, during performance of Procedure 42FH-ERP-014-0S: Fuel Movement, steps 7.2.1.2.3.1, 7.2.1.2.5.1, and 7.2.1.2.5.3 were not completed. A fuel bundle was moved to a core location other than that specified in the procedure.

On April 15, 1994, during performance of Procedure 34FH-OPS-001-0S: Fuel Movement Operation, steps 7.1.9 and 7.1.10 were not completed. The grapple was lifted with a fuel bundle not attached.

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

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RESPONSE TO VIOLATION 94-08-01

Admission or denial of the violation:

The violation occurred as described in the Notice of Violation.

Reason for the violation:

The three examples cited in the violation were caused by personnel error. In the first example, an apparent miscommunication between the Reactor Operator (RO) moving the fuel bundle and the Senior Reactor Operator (SRO) supervising the fuel movement resulted in a fuel bundle from the wrong spent fuel storage rack being moved to the fuel preparation machine. A fuel bundle from rack number ten, grid location H09, was required by the approved fuel movement sheets to be moved to the fuel preparation machine; however, the RO understood the SRO to say the fuel bundle was to come from rack number nine, grid location H09. The SRO did not adequately verify the move. He verified the bundle came from the correct grid location, H09, within the storage rack; however, he did not verify it came from storage rack number 10.

In the second example, the SRO supervising the core reload and the Reactor Engineer verifying the core reload failed to confirm the RO moving the fuel bundle to the core had taken it from the correct location within the spent fuel storage racks. As a consequence, the RO obtained a fuel bundle from the wrong storage rack location resulting in the improper fuel bundle being placed into the core. The failure of these personnel to verify the correct bundle was obtained from the storage racks was caused, in part, by difficulties the RO had in grappling the bundle and by refueling bridge equipment problems. The RO initially attempted to latch the correct bundle in the storage rack. This was verified to be the correct bundle by the SRO and the Reactor Engineer; however, the RO was unsuccessful in securing the bundle and, on the second try, latched onto an adjacent, and incorrect, fuel bundle. The SRO and the Reactor Engineer failed to re-verify the RO was latching the proper bundle on this second attempt. Equipment problems with an air hose take-up reel partially diverted the attention of both verifiers during the second attempt to latch the fuel bundle in the storage racks.

In the third example, the RO moving the fuel bundle failed to confirm the grapple was securely attached to the fuel bundle before lifting it from its location in the spent fuel pool storage rack. He failed to attempt to manually rotate the grapple to ensure it was secured

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to the fuel bundle and not free to move; he also apparently did not ensure the red "bundle-in-hook" light on the refueling bridge control panel was lit. This failure to follow procedural requirements and standard practices contributed, in part, to the second example of this violation as described earlier.

Corrective steps which have been taken and the results achieved:

As a result of the first example of this violation, involved personnel were counseled regarding their inappropriate actions.

As a result of the second and third examples of this violation, involved personnel were temporarily removed from fuel movement duties. In addition, they were counseled regarding their inappropriate actions.

The air hose take-up reel was adjusted per Maintenance Work Order 2-94-1230 on April 16, 1994.

Corrective steps which will be taken to avoid further violations:

No additional corrective actions to prevent further violations are deemed necessary at this time.

Date when full compliance will be achieved:

Plant Hatch presently is in full compliance with fuel movement procedures.