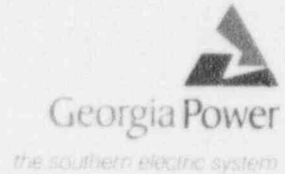


Georgia Power Company
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J. T. Beckham, Jr.
Vice President - Nuclear
Hatch Project

November 28, 1994



Docket No. 50-321
50-366

HL-4744

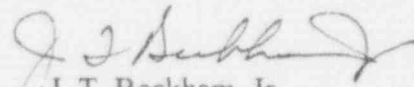
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Edwin I. Hatch Nuclear Plant
Revision to a Reply to a Notice of Violation

Gentlemen:

In response to your letter dated November 2, 1994, Georgia Power Company (GPC) is providing the enclosed, revised response to the Notice of Violation associated with Inspection Report 94-17. The response has been revised to address corrective actions for inadequate procedural controls for ensuring that the appropriate keys are identified and replaced following the replacement of remote shutdown panel locks.

Sincerely,



J. T. Beckham, Jr.

JKB/et

Enclosures: 1. Violation 94-17-02 and Revised GPC Response

cc: Georgia Power Company

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

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. B. L. Holbrook, Senior Resident Inspector - Hatch

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Enclosure 1

Edwin I. Hatch Nuclear Plant
Violation 94-17-02 and Revised GPC Response

VIOLATION 94-17-02

10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that activities affecting quality be accomplished in accordance with procedures.

Administrative Control Procedure 80AC-SEC-002-0S, "Key and Annunciated Door Control," Section 4.2.4, requires the Operations Department to "Control locks and keys to keylock switches and instrument cabinets."

Contrary to the above, a key located in the Unit 2 EOP File cabinet that was designated to unlock the Unit 2 Auxiliary Shutdown Panel, cabinet 2C82-P001, was not the proper type of key and would not unlock the panel.

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

RESPONSE TO VIOLATION 94-17-02

Admission or denial of the violation:

The violation occurred as described in the Notice of Violation.

Reason for the violation:

This violation was caused by a less than adequate plant procedure and a lack of procedural controls for lock replacement.

Procedure 34IT-EOP-001-0S, "EOP Equipment Checks," requires that an annual audit of the EOP filing cabinet materials be performed. The audit includes a check of the number of EOP key rings in the cabinets, and verification of the number and designation of the keys that are on each key ring. However, this procedure does not require that each key be confirmed to open its designated lock(s). This procedure is less than adequate in this regard.

Enclosure 1

• Violation 94-17-02 and Revised GPC Response

It appears that the lock for the Unit 2 Remote Shutdown Panel was previously replaced and the keys on the key rings in the EOP filing cabinets were not replaced with the proper key. Procedural controls were not sufficient to ensure that EOP keys for locks without a breakaway feature, such as the remote shutdown panels, are identified and replaced when a lock is replaced. However, access to the remote Shutdown Panel was ensured because the appropriate keys on the EOP key rings for the Shift Operations Supervisor and the Shift Clerk were replaced with the proper key.

Corrective steps which have been taken and the results achieved:

As a result of this violation, the following corrective actions have been performed:

1. Copies of the key to the replaced Unit 2 Remote Shutdown Panel lock were made, verified to open the Remote Shutdown Panel, and placed on the applicable EOP key rings. The previous keys were removed from the key rings.
2. All EOP keys have been verified to open their designated locks. No additional problems were noted.
3. Administrative controls have been implemented to ensure that the keys for the remote shutdown panels and other EOP keys for locks without a breakaway feature are replaced when the locks are replaced.

Corrective steps which will be taken to avoid further violations:

1. Procedure 34IT-EOP-001-0S will be revised and issued by 12/30/94 to require that all keys be verified to open their designated locks. The verification will be required to be done during the annual audit of the EOP filing cabinets. It should be noted that this verification has been completed for 1994 by performance of the corrective actions previously discussed.

Date when full compliance will be achieved:

Full compliance was achieved by 9/9/94 when the correct keys were placed on the EOP key rings and all the EOP keys were verified to open the applicable locks.