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Georgia Power

the southern electric system  
NED-83-606

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L. T. Gucwa  
Manager Nuclear Engineering  
and Chief Nuclear Engineer

December 14, 1983

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

REFERENCE:  
RII: RCL  
50-366  
Inspection Report  
83-29

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

Georgia Power Company submits the following response to Inspection Report 50-366/83-29, concerning the inspection of Mr. R. V. Crlenjak during the period of August 20 to September 30, 1983. One violation was identified.

VIOLATION:

Technical Specification 6.5.1.6.a requires that the Plant Review Board (PRB) shall be responsible for review of all procedures required by Technical Specification 6.8 and changes thereto.

Technical Specification 4.5.2 requires that the Automatic Depressurization System (ADS) shall be demonstrated operable by manually opening each ADS valve and observing that either; (1) the control valve or bypass valve position responds accordingly, or (2) there is a correspondence change in the measured steam flow.

Contrary to the above, From April 1, 1982, until July 8, 1983, the Technical Specification required method for ADS operational verification was not used. The procedure did prove operability by tailpipe pressure sensors to indicate opening of the relief valve; however, the Technical Specifications do not recognize this method. On April 1, 1982, the PRB approved a change to procedure HNP-2-3901 (Rev. 7) that deleted the Technical Specification required method for ADS operability verification and substituted another method for verification. On September 7, 1982 (Rev. 8), August 10, 1982 (Rev. 9), October 4, 1982 (Rev. 10), and on June 14, 1983 (Rev. 11, a general revision of the procedure), the PRB approved the procedure without the required method of ADS verification.

This is a Severity Level IV Violation.

RESPONSE:

Admission or denial of the alleged violation: The violation occurred.

Reason for violation: A design modification was completed adding pressure sensors to the SRV tailpipes. Indication of tailpipe pressure

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RESPONSE: (Continued)

provides a reliable means of verifying proper SRV function. Subsequently, the "Relief Valve Operability" procedure (HNP-2-3901) was revised to change the method of verification to use the newly installed pressure sensors. Personnel did not realize that the revision would make the procedure fail to meet the requirements of Technical Specifications section 4.5.2.b, which specifies a different method of verifying SRV operability. While it failed to meet the letter of the Technical Specifications, the new method fully met the intent of the subject Technical Specification, which was to verify operability of the SRVs. However, the requirements of Technical Specifications should have been more fully investigated prior to the procedure revision.

Corrective steps which have been taken and results achieved: The "Relief Valve Operability" procedure was revised on July 8, 1983 to return to the testing requirement delineated in the Technical Specifications. This procedure revision has been fully implemented.

Corrective steps which will be taken to avoid future violations: PRB members were made aware of this oversight as a result of LER 50-366/1983-39 and a review of the Inspection Report. They have been informed of the need for closer review of procedure changes proposed for safety-related systems which have a potential to impact Technical Specifications.

Date when full compliance will be achieved: Full compliance was achieved on July 8, 1983, when the procedure in question was revised to reflect Technical Specification Requirements.

If you have any questions, please contact this office.

Very truly yours,



L. T. Gucwa

REB/rb

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