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HL-2009
002809

January 17, 1992

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

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

In response to your letter of December 19, 1991, and in accordance with the provisions of 10 CFR 2.201, Georgia Power Company is providing the enclosed response to the Notice of Violation associated with NRC Inspection Report 91-30. A copy of this response is being provided to NRC Region II for review. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Sincerely,

J. T. Beckham, Jr.

JTB/cr

Enclosure

cc: Georgia Power Company
Mr. H. L. Sumner, General Manager - Nuclear Plant
NORMC

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

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ENCLOSURE

PLANT HATCH-UNI 1 AND 2
NRC DOCKETS 50-321 AND 50-366
OPERATING LICENSES DPR-57 AND NPF-5
VIOLATION 91-30-01 AND GPC RESPONSE

VIOLATION 91-30-01

Operating License paragraph 2.C.(3) for Unit 1 and paragraph 2.C.(3).b for Unit 2 states that Georgia Power shall implement and maintain in effect all provisions of the fire protection program, which is referenced in the Final Safety Analysis Report for the facility, as contained in the updated Edwin I. Hatch Nuclear Plant Units 1 and 2 Fire Hazards Analysis and Fire Protection Program, originally submitted by a letter dated July 22, 1986. The Licensee may make changes to the fire protection program without prior approval of the Commission only if the changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

The Fire Hazards Analysis (FHA), Appendix D, Item IV.B.6.c, states that procedures for fire brigade training have been written in accordance with the NRC guidelines contained in the June 20, 1977 document entitled Nuclear Plant Fire Protection Responsibilities, Administrative Controls and Quality Assurance. Attachment 2 to the 1977 NRC guidelines identifies an acceptable fire brigade training program, including fire brigade drills. Fire brigade drills are to be performed at regular intervals but not to exceed three months for each brigade.

The FHA Appendix H states that the fire detection system at Hatch conforms to the requirements of National Fire Protection Association (NFPA) 72E, Automatic Fire Detectors, except for some minor spacing and location deviations. NFPA 72E, Sections 8-2.4 and 8-3.4.1, require each automatic smoke detector to be visually inspected at least semiannually and operationally tested annually with smoke or other aerosol acceptable to the manufacturer.

Contrary to the above, these requirements were not met in that:

1. Procedure 40AC-008-05 (sic), Fire Protection Program, Section 8.2.3 requires only one annual, unannounced fire brigade drill per year and four training evolutions in conjunction with the fire brigade retraining sessions for each shift brigade. The procedure does not require drills to be performed at regular intervals with the interval between drills not to exceed three months for each shift brigade.

ENCLOSURE (Continued)

VIOLATION 91-30-01 AND GPC RESPONSE

2. Test Procedure 42SV-FPX-037-0S, Fire Detection Instrumentation Surveillance, requires only one operational test of one detector per zone per year. Many of the fire detector zones for safety related areas contain more than 10 detectors. Each smoke detector is not visually checked semiannually and is not operationally tested annually.

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

RESPONSE TO VIOLATION 91-30-01

Admission or denial of the violation:

The events occurred as described in the Notice of Violation.

Reason for the violation:

Example 1 of the violation was caused by personnel error. The writers and technical reviewers of procedures 40AC-ENG-008-0S, "Fire Protection Program," and 73TR-TRN-003-0S, "Fire Training Program," failed to ensure the procedures met the requirements of Attachment 2 to "Nuclear Plant Fire Protection Responsibilities, Administrative Controls and Quality Assurance."

Example 2 of the violation was caused by personnel error. Plant Engineering personnel furnished incorrect technical information in the request for changes to the fire detector surveillance requirements in section 2.2.2 of Appendix B to the Fire Hazards Analysis (FHA). Plant Nuclear Safety and Compliance personnel inadvertently incorporated the incorrect information into the applicable safety evaluation. The proposed changes were subsequently approved and incorporated into the FHA.

Corrective steps which have been taken and the results achieved:

Plant procedure 00AC-REG-003-0S, "Licensing Document Revision and Clarification Program," has been revised to require that all changes to the FHA be reviewed for technical accuracy by Plant Hatch's architect/engineer prior to initiation of the site approval process.

Corrective steps which will be taken to avoid further violations:

The writers and technical reviewers of procedures 40AC-ENG-008-0S and 73TR-TRN-003-0S will be counseled regarding their errors and the consequences thereof. This action has been completed. The personnel responsible for the incorrect safety evaluation for the fire detector surveillance changes no longer work for GPC; therefore, they cannot be counseled.

ENCLOSURE (Continued)

VIOLATION 91-30-01 AND GPC RESPONSE

Procedures 40AC-ENG-008-0S and 73TR-TRN-003-0S will be revised by 2/28/92 to require that fire drills for each brigade: 1) be performed at least once every 3 months and 2) cover the items specified in Attachment 2 to "Nuclear Plant Fire Protection Responsibilities, Administrative Controls and Quality Assurance." Performance of the new drills will be initiated during the second quarter of 1992.

The fire detectors listed in Appendix B to the FHA will be visually inspected by 2/28/92. Smoke detectors will be tested using smoke or an aerosol acceptable to the manufacturer by 5/1/92.

Section 2.2.2 of Appendix B to the FHA will be revised to require that smoke detectors be visually inspected once every 6 months and tested using smoke or an aerosol once every 12 months. The revision will be in place by 7/31/92.

Procedure 42SV-FPX-037-0S, "Fire Detection Instrumentation Surveillance," will be revised to comply with the revised FHA surveillance requirements. The revision will be effective by 7/31/92.

Date when full compliance will be achieved:

Example 1 - Full compliance will be achieved by 2/28/92 when procedures 40AC-ENG-008-0S and 73TR-TRN-003-0S are revised to accurately reflect the requirements for drill frequency and content.

Example 2 - Full compliance will be achieved by 5/1/92 when the required fire detector surveillances are completed.