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Georgia Power

the southern electric system

HL-2032
002899

February 3, 1992

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

PLANT HATCH - UNIT 2
NRC DOCKET 50-366
OPERATING LICENSE NPF-5
LICENSEE EVENT REPORT
ERRORS IN PLANT DOCUMENTS RESULT IN
MISSED TECHNICAL SPECIFICATION SURVEILLANCES

Gentlemen:

In accordance with the requirements of 10 CFR 50.73(a)(2)(i), Georgia Power Company is submitting the enclosed Licensee Event Report (LER) concerning errors in plant documents which resulted in missed Technical Specification surveillances. This event occurred at Plant Hatch - Unit 2.

Sincerely,

J. T. Beckham, Jr.

OCV/cr

Enclosure: LER 50-366/1992-001

cc: (See next page.)

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U.S. Nuclear Regulatory Commission

February 3, 1992

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

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. Ebner, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

LICENSEE EVENT REPORT (LER)

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TITLE (4)
ERRORS IN PLANT DRAWING AND FSAR RESULT IN MISSED TECHNICAL SPECIFICATIONS SURVEILLANCES

| EVENT DATE (5) | | | LER NUMBER (6) | | | REPORT DATE (7) | | | OTHER FACILITIES INVOLVED (8) | |
|----------------|-----|------|----------------|---------|-----|-----------------|-----|------|-------------------------------|------------------|
| MONTH | DAY | YEAR | YEAR | SEQ NUM | REV | MONTH | DAY | YEAR | FACILITY NAMES | DOCKET NUMBER(S) |
| 01 | 09 | 92 | 92 | 001 | 00 | 02 | 03 | 92 | | 05000 |
| | | | | | | | | | | 05000 |

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|-------------------------|--|------------------|----------------------|-------------------|--|--|--|--|--|--|
| OPERATING MODE (9) 1 | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR (11) | | | | | | | | | |
| POWER LEVEL 100 | 20.402(b) | 20.405(c) | 50.73(a)(2)(iv) | 73.71(b) | | | | | | |
| | 20.405(a)(1)(i) | 50.36(c)(1) | 50.73(a)(2)(v) | 73.71(c) | | | | | | |
| | 20.405(a)(1)(ii) | 50.36(c)(2) | 50.73(a)(2)(vii) | OTHER (Specify in | | | | | | |
| | 20.405(a)(1)(iii) | X 50.73(a)(2)(i) | 50.73(a)(2)(viii)(A) | Abstract below) | | | | | | |
| | 20.405(a)(1)(iv) | 50.73(a)(2)(ii) | 50.73(a)(2)(viii)(B) | | | | | | | |
| | 20.405(a)(1)(v) | 50.73(a)(2)(iii) | 50.73(a)(2)(x) | | | | | | | |

LICENSEE CONTACT FOR THIS LER (12)

| | |
|--|--|
| NAME STEVEN B. TIPPS, MANAGER NUCLEAR SAFETY AND COMPLIANCE, HATCH | TELEPHONE NUMBER AREA CODE: 912, NUMBER: 367-7851 |
|--|--|

COMPLETE ONE LINE FOR EACH FAILURE DESCRIBED IN THIS REPORT (13)

| CAUSE | SYSTEM | COMPONENT | MANUFAC-TURER | REPORT TO NPRDS | CAUSE | SYSTEM | COMPONENT | MANUFAC-TURER | REPORT TO NPRDS |
|-------|--------|-----------|---------------|-----------------|-------|--------|-----------|---------------|-----------------|
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SUPPLEMENTAL REPORT EXPECTED (14)

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|--|--|-------------------------------|----------------|
| <input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE) | <input checked="" type="checkbox"/> NO | EXPECTED SUBMISSION DATE (15) | MONTH DAY YEAR |
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ABSTRACT (16)

On 1/9/92 at 1400 CST, Unit 2 was in the Run mode at a power level of 2436 CMWT (100% rated thermal power). At that time, non-licensed plant Engineering personnel determined that a local leak rate test of Primary Containment penetration X-222A had not been performed as required by Unit 2 Technical Specifications section 4.6.1.2.d. Also, it was determined that the penetration had not been verified to be closed at least once every 31 days as required by Unit 2 Technical Specifications section 4.6.1.1.a.1. A visual inspection of the penetration's sealing device performed on 1/9/92 revealed it to be intact, with no visible or audible signs of leakage or signs of deterioration. Georgia Power Company determined that the penetration did not have to be declared inoperable until a leak rate test could be performed. The NRC was informed of this on 1/9/92. The leak test was done on 1/10/92 after a test volume was installed in order to allow the penetration to be tested. The penetration's as-found leakage rate was zero actual cubic centimeters per minute (ACCM).

This event was caused by errors in a plant drawing and the Unit 2 Final Safety Analysis Report (FSAR). Plant drawing S-28719 incorrectly showed the penetration's sealing device as one not requiring a local leak rate test or periodic inspection to verify it was closed. The Unit 2 FSAR also incorrectly identified penetration X-222A as not requiring a local leak rate test.

Corrective actions include performing a leak rate test of the penetration, revising applicable procedures to include checks of the penetration, modifying the penetration, and inspecting the remaining penetrations in inaccessible areas of Unit 2.

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TEXT

PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor
Energy Industry Identification System codes are identified in the text as (EIIIS Code XX).

DESCRIPTION OF EVENT

On 1/9/92 at 1400 CST, Unit 2 was in the Run mode at a power level of 2436 CMWT (100% rated thermal power). At that time, non-licensed plant Engineering personnel were reviewing the results of a walkdown of accessible Unit 2 Primary Containment (EIIIS Code NH) penetrations. The walkdown, completed 12/13/91, was part of the corrective action for an event described in LER 50-366/1991-018, dated 7/3/91. Engineering personnel determined from their review that a local leak rate (Type B) test of Primary Containment penetration X-222A, a spare penetration in the Unit 2 Suppression Chamber, had not been performed as required by Unit 2 Technical Specifications section 4.6.1.2.d. This specification requires that local leak rate tests of Primary Containment penetrations be performed during each shutdown for refueling, but in no case at intervals greater than two years.

The as-found configuration of the penetration's sealing device, a bolted blind flange with a gasket, was such that a local leak rate test was required by the Unit 2 Technical Specifications, but the penetration was not included in plant procedure 42SV-TET-001-2S, "Primary Containment Periodic Type B and Type C Leakage Tests." Engineering personnel documented the failure to perform a local leak rate test on this penetration on a Deficiency Card as required by plant administrative control procedures. It was later noted that the penetration also had not been verified to be closed at least once every 31 days as required by Unit 2 Technical Specifications section 4.6.1.1.a.1.

Plant Nuclear Safety and Compliance personnel and additional Engineering personnel inspected the penetration on 1/9/92. They found the penetration, blind flange, and gasket to be in good condition with no visible or audible signs of leakage or signs of deterioration. (This inspection, in effect, satisfied the surveillance requirements of section 4.6.1.1.a.1.) This information was conveyed to NRC personnel during the afternoon and evening of 1/9/92 along with the fact that the penetration's sealing device had been tested successfully several times during overall integrated containment leakage rate (Type A) tests. It was also noted this was a spare penetration not subject to wear or deterioration from repeated opening and closing and it was unlikely to have been disturbed since the last, successful Type A test in 1989. The NRC was informed it was Georgia Power Company's position that the penetration did not have to be considered inoperable until a local leak rate test could be performed and the penetration's leakage rate determined. It was agreed the penetration did not have to be considered inoperable and the local leak rate test would be performed as expeditiously as possible.

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The sealing device for penetration X-222A did not have a test connection to allow a Type B test to be performed. Therefore, a method had to be devised to test it. It was decided to fabricate a test volume with a test connection, place it over the blind flange and gasket, and weld it to the penetration. The plant's Architect/Engineer reviewed the test volume proposed by plant Engineering personnel and prepared a safety evaluation supporting its temporary installation. The sketch of the test volume and the safety evaluation were reviewed and approved by the Plant Review Board in meeting number 92-003 on 1/10/92 at 0826 CST per the requirements of procedure 30AC-OPS-005-05, "Temporary Modification Control." The test volume was fabricated using 10-inch, schedule 80 carbon steel (Type SA106, Grade B, Class 2) pipe per the approved Engineering sketch and welded to the penetration on 1/10/92 per Maintenance Work Order 2-92-0095 and the approved temporary modification.

On 1/10/92 at 1650 CST, a Type B test of penetration X-222A was begun per procedure 425V-TET-001-2S which had been temporarily changed to include a local leak rate test of the penetration. At 1940 CST, the test was satisfactorily completed. No leakage was found. The test volume was then removed from the penetration per Maintenance Work Order 2-92-0095. Non-destructive examination of the areas of the penetration to which the test volume was welded was performed and no problems were found.

CAUSE OF EVENT

This event was caused by errors in a plant drawing and the Unit 2 FSAR. Plant drawing S-28719 incorrectly showed the penetration's sealing device as one not requiring a local leak rate (Type B) test or periodic visual inspection to verify it was closed. The drawing showed the penetration sealed by a welded cap. A welded cap is not subject to the requirements of Unit 2 Technical Specifications section 4.6.1.1.a.1 or 4.6.1.2.d because it is not a sealing device which could be opened and it does not fit the definition of those devices requiring a Type B test, respectively. The actual sealing device, a bolted blind flange and a gasket, is subject to both requirements. Unit 2 FSAR Table 3.8-5 also incorrectly identified penetration X-222A as requiring only a Type A test. As a result of these errors, this penetration was not included in the surveillance procedures for periodic visual inspection and a Type B test.

It could not be determined why the drawing did not reflect the actual configuration of the penetration. No record of the drawing being revised or the penetration being modified could be found. A February 1984 Maintenance Request to tighten one of the nuts on the flange indicated the as-found configuration existed at that time. No records of a Type B test having been performed on the penetration were found.

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TEXT

REPORTABILITY ANALYSIS AND SAFETY ASSESSMENT

This report is required per 10 CFR 50.73(a)(2)(i) because a condition prohibited by the plant's Technical Specifications existed. The requirements of Unit 2 Technical Specifications sections 4.6.1.2.d and 4.6.1.1.a.1 had not been met for Primary Containment penetration X-222A. Due to errors in plant drawing S-28719 and Unit 2 FSAR Table 3.8-5, local leak rate (Type B) tests had not been performed on the penetration as required by section 4.6.1.2.d, and periodic verification that the penetration was closed was not performed as required by section 4.6.1.1.a.1.

The Primary Containment is designed to limit the leakage of radioactive materials released from a breach of the nuclear system process piping during and following the postulated Design Basis Accident. The limitations on Primary Containment leakage, as contained in the Unit 2 Technical Specifications, ensure that total containment leakage is less than that which would result in offsite doses greater than those allowed by 10 CFR 100. The Unit 2 Technical Specifications require periodic verification testing of the leak-tight integrity of individual Primary Containment penetration isolation barriers. The purpose of these tests is to assure leakage through the Primary Containment penetration isolation barriers does not exceed allowable leakage values as specified in the Technical Specifications and accident analyses.

In the event described in this report, it was found that one of the containment isolation barriers, the blind flange and gasket for penetration X-222A, had not been tested in accordance with the requirements of the Unit 2 Technical Specifications. Specifically, the penetration barrier had not been subjected to the required local leak rate test nor had it been verified to be closed once every 31 days. The leak-tight integrity of the containment, including penetration X-222A, had been verified periodically as part of the overall integrated containment leakage rate, or Type A, test. While the Type A test did not test penetration X-222A specifically, it did verify the overall Primary Containment leakage was within acceptable limits. Leakage through all containment isolation barriers, including the blind flange and gasket for penetration X-222A, was verified to be less than that specified in the Unit 2 Technical Specifications and accident analyses.

Upon discovery of this event, a local leak rate test was performed on penetration X-222A. No leakage was found (i.e., its as-found leakage was zero). Because this is a spare penetration, its isolation barrier is not subjected to use (e.g., opening and closing during normal plant operations, removal and replacement during refueling) which could result in the degradation of the ability of the blind flange and gasket to limit leakage through the penetration. Therefore, it is reasonable to conclude its leakage has always been within acceptable limits and it has been in the isolated (closed) condition during unit operation.

Based on the above analysis, it is concluded that this event had no adverse impact on the public health and safety. This analysis is applicable to all power levels and operating conditions for which Primary Containment integrity is required.

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CORRECTIVE ACTIONS

A temporary test volume was installed over the penetration per approved plant procedures to allow a Type B test to be performed. Procedure 42SV-TET-001-2S was temporarily changed to include a Type B test of penetration X-222A and the penetration was tested on 1/10/92. The penetration's as-found leakage rate was zero actual cubic centimeters per minute (ACCM). The test volume was then removed.

Procedure 34SV-SUV-011-2S, "Primary and Secondary Containment Integrity Demonstration," will be revised to include the required 31-day verification that penetration X-222A is closed. This revision will be effective by 2/9/92 when the next verification of this penetration is due.

A physical walkdown of the Unit 1 Primary Containment penetrations and the accessible portion of the Unit 2 Primary Containment penetrations has been completed. A review of the Unit 2 walkdown results led directly to the discovery of this event. A review of all of the walkdown results did not reveal any other similar problems. A physical walkdown of the non-accessible portion of the Unit 2 Primary Containment penetrations will be performed by the end of the Fall 1992 Unit 2 refueling outage as previously committed to in LER 50-366/1991-018.

Penetration X-222A will be modified during the Fall 1992 Unit 2 refueling outage either to add a test connection so a local leak rate test can be performed or to change the spare penetration's sealing device so a local leak rate test is not required. Unit 2 FSAR Table 3.8-5, procedures 42SV-TET-001-2S and 34SV-SUV-011-2S, and drawing S-28719 will be revised as necessary to reflect the chosen option.

ADDITIONAL INFORMATION

No systems other than Primary Containment were affected by this event. Penetration X-222A is a spare penetration; consequently, its condition can affect no other systems or components.

No failed components caused or resulted from this event.

A previous similar event in which it was discovered that required testing had not been performed on a Primary Containment penetration was reported in LER 50-366/1991-018, dated 7/3/91. Corrective actions for that event included a walkdown of both units' Primary Containment penetrations. These walkdowns led directly to the discovery of this event. To date, no other problems have been found. Only non-accessible Unit 2 penetrations remain to be walked down and this will be done per the commitment and schedule given in LER 50-366/1991-018.