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Georgia Power
the southern electric system

NED-84-193

April 13, 1984

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

REFERENCE:
RII: RCL
50-321/50-366
I&E Inspection
Report 84-07

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

Georgia Power Company provides the following response to violations identified during an inspection conducted on January 21 - February 20, 1984, and reported by your letter dated March 14, 1984.

VIOLATION 1:

10 CFR 50, Appendix B, Criterion X, as implemented by Section D.9 of the Hatch Unit 1 Final Safety Analysis Report (FSAR) and Section A.33 of the Hatch Unit 2 FSAR, requires the licensee to comply with ANSI N18.7-1976. Section 5.2.7 of ANSI N18.7-1976 specifies that maintenance and modifications which may affect functioning of safety-related systems be performed in a manner to ensure quality at least equivalent to that specified in original design bases and requirements. It also specifies that a suitable level of confidence in systems on which maintenance or modifications have been performed shall be attained by appropriate inspection.

Contrary to the above, on February 16, 1984, the NRC inspector identified a system not restored to original design requirements in that the thermal insulation and electrical heat tracing on approximately a three foot section of piping downstream of the Unit 1, Division 1, Plant Service Water strainer A backwash valve, P41-F313A was not properly restored.

This is a Severity Level IV violation (Supplement I) for Unit 1 only.

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RESPONSE TO VIOLATION 1:

Admission or Denial of Alleged Violation: The violation occurred.

Reason for the Violation: The safety-related Maintenance Request (MR) did not adequately describe the work to be performed. MR 1-83-5911 which controlled the work to be performed did not address restoration of the thermal insulation and electrical heat tracing following repair of the pipe. The MR was completed on December 5, 1983.

Corrective Steps Which Have Been Taken and the Results Achieved: On January 30, 1984, a Management Overview Committee was established to review safety-related MRs for proper work instructions and adequacy of the functional test requirements prior to work being performed. The insulation and heat tracing were properly replaced and the system was restored to original design requirements on February 23, 1984.

Corrective Steps Which Will Be Taken to Avoid Future Violations: The entire maintenance work order process is being changed to require that MRs pass through a work control center for review and processing. This group reviews MRs to ensure that they contain sufficient information for work to be performed properly. Until this new process is fully functional so as to ensure adequate MR review and processing, the Management Overview Committee will be responsible for reviewing safety-related MRs.

Date When Full Compliance Was Achieved: Full compliance was achieved on February 23, 1984, when the system was restored to original design requirements.

VIOLATION 2:

Technical Specification 6.8.1 requires that written procedures be implemented.

Contrary to the above, procedure HNP-2-1500, Primary Containment Atmospheric Control Systems, was not properly implemented due to procedure inadequacies in that, between July 2, 1983 and February 3, 1984, during periods of Unit 2 containment inerting evolutions, no procedural provision existed to prevent nitrogen being admitted to the torus at temperatures below the specified band of 100-250F.

This is a Severity Level IV violation (Supplement I) for Unit 2 only.

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RESPONSE TO VIOLATION 2:

Admission or Denial of Alleged Violation: The violation occurred.

Reason for the Violation: Plant Hatch procedure HNP-2-1500, Primary Containment Atmosphere Control Systems, did not adequately ensure proper operation of the nitrogen inerting system. This procedural inadequacy allowed the nitrogen temperature at the vaporizer controller (T48-B001) to drop, during containment inerting, below the specified band of 100-250°F. The procedure specifically cautioned against operation of the vaporizer below 100°F., but did not specify actions to be taken if the temperature did fall below the specified band. It is to be noted that HNP-2-1500 addresses vaporizer controller temperature, and not the temperature of the nitrogen downstream of the vaporizer.

Corrective Steps Which Have Been Taken and the Results Achieved: Unit 2 was shutdown at the time of discovery of the procedure deficiency and is still shutdown until approximately July, 1984. Therefore, the immediate corrective steps taken were focused on Unit 1 which was operating at the time. Standing Order 84-07 was issued February 6, 1984, to monitor torus temperature while inerting containment. Plant Hatch procedure HNP-1-1500, Primary Containment Atmospheric Control Systems, was revised and approved for use on March 2, 1984.

Corrective Steps Which Will Be Taken to Avoid Future Violations: Plant Hatch procedure HNP-2-1500 is currently in the revision process and will be revised prior to startup from the current outage and, more importantly, prior to the reintroduction of nitrogen to the torus.

Date When Full Compliance Was Achieved: Full compliance will be achieved prior to startup when HNP-2-1500 will be revised and re-issued to prevent nitrogen from being admitted to the torus at low temperatures.

VIOLATION 3:

Technical Specification 6.8.1 requires that written procedures be implemented.

Contrary to the above, on February 15, 1984, the NRC inspector discovered that:

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VIOLATION 3 (Continued):

- a. Procedure HNP-809, Section F.1.b, Plant Modifications Approval and Implementation, was not properly implemented in that Design Change Request 83-28 was closed out without the appropriate changes being made to Unit 1 drawing H-11304, Fire Protection P&ID, as required by As-Built Notice 83-238.
- b. Procedure HNP-812, Section E.4, As-Built Notice was inadequate in that the procedure only requires verification that the appropriate As-Built Notice number appear in the drawing revision block. No requirement exists for verifying that the specified change had accurately been made to the drawing, as described in 1 above.

This is a Severity Level V violation (Supplement I) for Unit 1 only.

RESPONSE:

Admission or Denial of Alleged Violation: A violation of NRC requirements occurred. However, we do not agree with the violation as written, in that the specific procedures cited in the Notice of Violation were adequate and not violated. Procedure HNP-809, Plant Modifications Approval and Implementation, requires that the As-Built Notices (ABN) form be filled in and sent to the Architect/Engineer (A/E) prior to Design Change Request (DCR) closeout. ABN 83-238 was filled in and sent to the A/E before the closeout of DCR 83-28. As stated in the Notice of Violation, drawing H-11304 indicated that ABN 83-238 had been incorporated into the drawing. HNP-812 requires verification that the appropriate As-Built Notice number appear in the drawing revision block. It was not, and is not, our intent that HNP-812 address the engineering process of incorporation of the ABN into a drawing. Rather, this function is prescribed by procedures controlling our A/E's implementation of the ABN process which ensure that the ABN has been incorporated properly. In this case the A/E, Southern Company Services, failed to follow their procedures governing this action. We, therefore, conclude that a violation of Technical Specification 6.8.1 did not occur regarding this action. The following response addresses the violation of NRC requirements.

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RESPONSE TO VIOLATION 3 (Continued)

Reason for the Violation: A/E Design Engineering personnel failed to follow their existing procedures. Previous annual audits by Georgia Power Company and Southern Company Services corporate Quality Assurance departments have found the A/E's controls over ABN incorporation to be satisfactory. This includes review of the adequacy of procedures for checking of drawings prior to issuance. Based on the results of those audits, we conclude that this is an isolated incident and is not indicative of a programmatic deficiency.

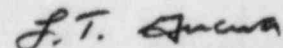
Corrective Steps Which Have Been Taken and the Results Achieved:
Drawing H-11304, Fire Protection P&ID, was revised to incorporate APN 83-238 correctly. This was completed on February 21, 1984.

Corrective Steps Which Will Be Taken to Avoid Future Violations:
Georgia Power Company and Southern Company Services corporate Quality Assurance departments will continue to audit the area of ABN incorporation during their annual audits. Special emphasis of this area will be included in the next scheduled audit.

Date When Full Compliance Was Achieved: Full compliance was achieved on February 21, 1984, when As-Built Notice 83-238 was incorporated properly into drawing H-11304.

If you have any questions regarding this response or require further information regarding our actions in this matter, please contact this office.

Very truly yours,



L. T. Gucwa

MJB

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