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J. T. Beckham, Jr.
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Docket Nos. 50-321
50-366

HL-5047

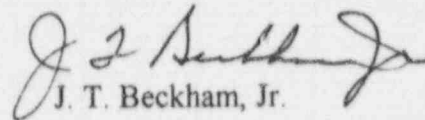
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

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

Gentlemen:

In response to your letter dated September 29, 1995, and according to the requirements of 10 CFR 2.201, Georgia Power Company (GPC) is providing the enclosed response to the Notice of Violation associated with Inspection Report 95-18. A transcription of the NRC violation precedes GPC's response to the violation.

Sincerely,


J. T. Beckham, Jr.

JKB/eb

Enclosure: Violation 95-18-02 and GPC Response

cc: Georgia Power Company
Mr. H. L. Sumner, Jr., Nuclear Plant General Manager
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. Ebnetter, Regional Administrator
Mr. B. L. Holbrook, Senior Resident Inspector - Hatch

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Edwin I. Hatch Nuclear Plant
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VIOLATION 95-18-02

10 CFR 50, Appendix B, Criteria V, Instructions, Procedures and Drawings, requires that activities affecting quality shall be prescribed by documented instructions and shall be accomplished in accordance with these instructions.

Procedure 52PM-MME-006-0S: Intake Structure Pit Inspection, Revision 3, delineates the requirements, precautions/limitations, and prerequisites for performing underwater inspection activities in the intake structure.

Procedure 34SO-P73-001-1S: Hydrogen Water Chemistry Hydrogen Injection System, Revision 11, Section 7.3.4, Manual Operation of Hydrogen Controller, delineates the necessary steps for reducing the hydrogen injection flow rate.

Contrary to the above:

1. On August 23, 1995, inspection of the intake structure pit was not accomplished in accordance with procedure 52PM-MME-006-0S in that a diver entered the intake structure and performed work activities without the use of the procedure. This contributed to the diver's support line entering the Residual Heat Removal Plant Service Water pump, rendering it inoperable.
2. On August 27, 1995, a reduction in the Unit 1 hydrogen injection flow rate was not accomplished in accordance with procedure 34SO-P73-001-1S in that an operator performed a step not delineated in the procedure. This caused the hydrogen flow to increase beyond the desired value, and resulted in unnecessary exposure to personnel performing maintenance in the condenser bay.

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

GPC RESPONSE TO VIOLATION 95-18-02

Reason for the violation:

Violation Example No. 1:

Example No. 1 of the violation was caused by miscommunication among plant personnel regarding the applicability of plant procedure 52PM-MME-006-0S, "Intake Structure Pit Inspection," during diving activities performed at the intake structure on August 23, 1995.

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Procedure 52PM-MME-006-0S is normally used during yearly inspections of the intake structure pit to determine and document levels of silt buildup. The 1995 yearly inspection was satisfactorily completed in July using procedure 52PM-MME-006-0S.

Problems with clogging of plant service water-cooled heat exchangers prompted plant management to request an inspection of the silt buildup in the intake structure pit as part of the investigation to resolve the heat exchanger clogging problems. Since the activity was not considered a yearly inspection, personnel in charge of the diving activities did not understand the need to complete the procedure data package.

Violation Example No. 2:

Example No. 2 was caused by the following:

- a. Personnel error in that the Plant Equipment Operator (PEO) assigned to lower the hydrogen injection flow rate for a Unit 1 condenser bay entry failed to follow system operating procedure 34SO-P73-001-1S, "Hydrogen Water Chemistry Hydrogen Injection System," when he decreased the flow rate on August 27, 1995. The PEO placed the hydrogen injection flow rate controller in the manual (internal) mode and lowered the flow rate to the desired value of 8 scf/min. He then placed the controller in the automatic (external or load following) mode, resulting in the flow rate automatically increasing to the pre-reduction value of 45 scf/min. The increase in hydrogen injection flow rate caused higher-than-expected dose rates and unnecessary exposure to personnel performing inspections and working in the Unit 1 condenser bay.
- b. A less-than-adequate system operating procedure in that plant procedure 34SO-P73-001-1S did not provide adequate instructions concerning when and how to return the hydrogen injection flow rate controller to the automatic mode following manual operation. Additionally, the procedure did not identify the differences between the manual and automatic modes of controller operation and the effect of returning the controller to the automatic mode following manual changes in the hydrogen injection flow rate.
- c. Less-than-adequate training on the flow control modes of the hydrogen injection system in that some Operations personnel did not fully understand the effects of changing controller modes and the flow rate setpoint while in the manual mode. In this event, both the PEO and the licensed operator incorrectly thought that when the hydrogen injection system is in the automatic mode, changing the flow rate would result in a change to the setpoint; i.e., the flow rate would remain at 8 scf/min, regardless of controller mode. Consequently, the licensed operator failed to correct

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the PEO when informed that the flow rate had been reduced to 8 scf/min and the controller placed in the automatic mode.

Corrective steps taken and the results achieved:

Violation Example No. 1:

1. Involved personnel have been disciplined in accordance with the Georgia Power Positive Discipline Program.
2. Signs indicating that control room personnel are to be notified prior to workers entering the intake structure pit were painted on the walls above the entrance to the intake structure pit area.
3. Procedure 52PM-MME-006-0S was revised to require its use whenever divers enter the intake structure pit for any reason.
4. Procedure 52 PM-MME-006-0S was temporarily revised to require either the use of floats on diver support lines or to maintain the lines tight and clear at all times. A permanent revision is in progress.

Violation Example No. 2:

1. Involved personnel were counseled regarding their actions.
2. Shift Operations personnel were trained via "beginning-of-shift training" on the response of the hydrogen injection flow rate controller when it is returned to the automatic (external) mode.
3. The Unit 1 and Unit 2 hydrogen injection flow rate controllers were placed in the manual (internal) mode of operation. Caution tags were put on both controllers to prevent the controllers from being placed in the automatic mode until additional corrective actions can be taken.

Corrective steps taken to avoid further violations:

1. Training material for PEOs will be revised to provide: a.) a detailed explanation of how the automatic mode of the hydrogen injection flow rate controller functions, b.) the effect of placing the controller in the automatic mode, and c.) the effects of changing the flow rate setpoint while in the manual and automatic modes of controller operation. The training will be completed by December 29, 1995.
2. The event detailed in Violation Example No. 2 will be included in license and non-license requalification training by January 22, 1996.

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3. Procedures 34SO-P73-001-1S and 34SO-P73-001-2S will be revised to provide more detail on controller operation and instructions on when and how to return the hydrogen injection flow rate controller to the automatic mode following manual operation. The revisions will be completed by October 27, 1995. The controllers will remain in the manual mode of operation as described previously until the procedures are revised.
4. The rules of procedure usage will be re-emphasized to Operations personnel through "beginning-of-shift training."

Date when full compliance will be achieved:

Plant Hatch presently is in full compliance with the requirements of the applicable procedures.