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Georgia Power
the southern electric system

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

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HL-5071

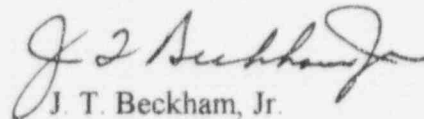
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

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

Gentlemen:

In response to your letter dated October 25, 1995, and in accordance with 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 95-22. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Sincerely,


J. T. Beckham, Jr.

JKB/eb

Enclosure: Violation 95-22-01 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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Enclosure

Edwin I. Hatch Nuclear Plant
Violation 95-22-01 and GPC Response

VIOLATION 95-22-01

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 34GO-OPS-065-2S: Control Rod Movement, Revision 14, step 7.1.1, in part, requires personnel to perform control rod movements in accordance with attachment 1 of the control rod movement sequence sheets. Attachment 1, in part, requires step 59C of sequence A1 be completed. Step 59C required control rod 30-15 to be moved from position 48 to position 18.

Procedure 30AC-OPS-009-0S: Control Room Instrumentation, Revision 19, Step 8.2.4, in part, states that, any annunciator which is inoperable or otherwise requires corrective maintenance or engineering action is a problem annunciator. Procedure step 8.3.1, in part, states that for each problem or inoperable annunciator an annunciator control sheet shall be initiated and maintained until the annunciator is reset or returned to service.

Contrary to the above:

1. During the Unit 2 shutdown on September 22, while performing attachment 1 of procedure 34GO-OPS-065-2S, operations personnel selected and moved control rod 30-15 from position 48 to position 12 in lieu of selecting and moving control rod 30-15 from position 48 to position 18.
2. Procedure 30AC-OPS-009-0S: Control Room Instrumentation, Revision 19, was not performed following operator identification of deficiencies with the Unit 1 Low Pressure Coolant Injection Inverter tripped alarm-circuit on March 7, 1995. This resulted in a failure to initiate and maintain an annunciator control sheet to identify, label and implement compensatory actions for a problem annunciator for a safety related component from March 7 to September 7, 1995.

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

RESPONSE TO VIOLATION 95-22-01

Reason for the violation:

Violation Example 1

This example was caused by personnel error. The Operator inserting control rod 30-15 failed to take the actions necessary to ensure the control rod did not travel beyond its insert limit of 18.

Violation Example 2

An annunciator control sheet was not initiated for the Low Pressure Coolant Injection (LPCI) Inverter annunciator circuit because the annunciator circuit was functioning properly. The Lundell annunciator cabinets and the annunciator in the Main Control Room functioned properly; however, a problem within the LPCI Inverter prevented a trip signal from reaching the Lundell cabinet and the annunciator in the Main Control Room. Operations personnel were aware that the annunciator would not alarm in the event the LPCI Inverter tripped; however, they did not initiate an annunciator control sheet because the problem was not in the annunciation circuit itself.

Corrective steps which have been taken and the results achieved:

Violation Example 1

1. The involved operator was temporarily disqualified from performing evolutions that affect reactivity, including moving fuel during refueling activities. In addition, he and his supervisor were disciplined per GPC's Positive Discipline Program.
2. This event was discussed with other operating shifts. The importance of reactivity control and the consequences of personnel errors were reemphasized.
3. An Operating Order requiring the termination of continuous rod motion prior to reaching the specified limit when using continuous insert or withdrawal, except when the limit is fully inserted or fully withdrawn, was issued 10/28/95. The Operating Order also required control rods to be moved by single-notch-movement when approaching an insertion or withdrawal limit.
4. Two separate groups of four licensed operators each reviewed the Operations Department Policy on reactivity control and their comments were used to revise the policy. The revised Operations Department Policy was covered in Unit 2 start-up training and was issued in final form prior to start-up from the 1995 Unit 2 refueling outage. The revised policy incorporates the requirements of the Operating Order listed previously.

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Violation 95-22-01 and GPC Response

Violation Example 2

The annunciator was declared inoperable and labeled, and compensatory actions were initiated on 9/7/95 per the requirements of procedure 30AC-OPS-009-0S. The problem, which appears to have been caused by dirty connection points on a card within the LPCI Inverter, has since been corrected and the annunciator returned to service.

Corrective steps which will be taken to avoid further violations:

The Rod Worth Minimizers enforce insertion and withdrawal limits only from zero to approximately 27% rated thermal power. For control rods whose withdrawal limits are specified by the STA/Reactor Engineer based upon control rod pattern and core conditions, and whenever the Rod Worth Minimizer is out of service, a verifier is used to ensure compliance with the applicable limits. Consequently, no additional actions are required.

Date when full compliance will be achieved:

For Violation Example 1, full compliance was achieved on 9/22/95 when control rod 30-15 was placed at its correct position per procedure 34AB-C11-004-2S, "Mispositioned Control Rod."

For Violation Example 2, full compliance was achieved on 9/7/95 when the annunciator was declared inoperable and labeled, and compensatory actions were initiated per the requirements of procedure 30AC-OPS-009-0S.