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Georgia Power

the southern electric system

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NED-84-339

July 9, 1984

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

REFERENCE:  
RII: JPO  
50-321/50-366  
I&E Inspection  
Report 84-13

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

Georgia Power Company provides the following response to a violation identified during an inspection conducted on March 21 - April 20, 1984, and reported by your letter dated June 7, 1984 and Report Nos. 50-321/84-13 and 50-366/84-13.

VIOLATION:

T.S. 6.8.1.a requires that written procedures be established, implemented and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev 2., February 1978. Hatch Nuclear Plant procedure HNP-821, Quality Control Work Inspection Program, paragraph G.1.a(1) requires that inspections be performed on all significant rework and modifications to safety related systems and components to ensure adherence to drawings, specifications and procedures.

10 CFR 50, Appendix B, Criterion V, as implemented in Hatch Unit 2 FSAR Section 17.2.5 requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances.

Contrary to the above, on April 27, 1981, work on the High Pressure Coolant Injection System minimum flow valve, E41-F012, was performed without adequate documented instructions, procedures or drawings appropriate to the circumstances in that the maintenance request number 1-81-1832 did not prevent nor did inspections detect the installation of short studs which resulted in the improper thread engagement of four studs which are utilized in attaching the motor operator to the valve. Consequently, on April 12, 1984, the NRC inspector identified one of the four bolted connections on the minimum flow valve, E41-F012, operator which was not properly fastened (threads galled and stud backed out). Subsequent performance of the surveillance to prove operability demonstrated that the valve, E41-F012, would not stroke.

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

RESPONSE TO VIOLATION:

Admission or Denial of Alleged Violation: The violation occurred.

Reason for the Violation: Review by the Quality Control (QC) Department of maintenance requests concerning adequacy of the work instructions and level of QC inspection was not performed in April 1981 to the detail to which it is currently performed. QC reviewed Maintenance Request (MR) 1-81-1832 to determine QC involvement in this work activity. This review showed QC participation in what QC considered at the time to be the significant activities of the repair. QC documents show substantial QC activity during valve disassembly, repair and reassembly. MR 1-81-1832 was initiated due to failure of the local leak rate test; therefore, installation of the motor operator was not considered to be as significant as the repair of the valve itself.

Corrective Steps Which Have Been Taken and the Results Achieved: On April 13, 1984, a deficiency report (1-84-141) was written on the valve. On April 15, 1984, the motor operator attachment to the valve was repaired and successfully stroked per plant procedures. On May 24, 1984, the Maintenance Department replaced the short studs with studs having adequate thread engagement and installed locknuts on the gland retaining studs.

Corrective Steps Which Will Be Taken to Avoid Further Violations: It has been and will continue to be the policy of the QC Department to witness significant activities for safety related major maintenance. Since the date of this maintenance request, QC has increased its inspection of less significant maintenance activities.

Date When Full Compliance Was Achieved: Full compliance was achieved on May 24, 1984.

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If you have any further questions on this response, please contact this office.

Very truly yours,

*L. T. Guwa for*

L. T. Guwa

MJB

xc: H. C. Nix, Jr.  
Senior Resident Inspector