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February 12, 1996

Docket No. 50-366

HL-5107

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

Edwin I. Hatch Nuclear Plant - Unit 2
Reply to a Notice of Violation

Gentlemen:

In response to your letter dated January 19, 1996, 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 95-26. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Sincerely,

J. T. Beckham, Jr.

JKB/eb

Enclosure: Violation 95-26-01 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 95-26-01 and GPC Response

VIOLATION 95-26-01

License Condition 2.C.(3)(b) requires Georgia Power Company to implement and maintain in effect all provisions of the fire protection program, which is referenced in the Final Safety Analysis Report for the facility as contained in the Fire Hazards Analysis and Fire Protection Program.

Appendix E, of Units 1 and 2, Fire Hazards Analysis and Fire Protection Program, requires the capability to safely shutdown both units using the systems of pathway three Safe Shutdown Methodology in the event of a fire in area 24 which consists of the main control room, cable spreading room, and the computer room. Pathway three specifies the system necessary to implement a safe shutdown in the event of a fire in area 24.

Section 10.1 of Units 1 and 2 Fire Hazards Analysis, Unit 2 Safe Shutdown Analysis, identifies specific equipment and required actions for safe shutdown of Unit 2 in the event of a fire in area 24.

Contrary to the above, as of November 2, 1995, the licensee failed to maintain in effect all the provisions of the fire protection program in that, specific Unit 2 systems identified in Appendix E of Units 1 and 2 Fire Hazards Analysis and Fire Protection Program and equipment identified in Section 10.1, Unit 2 Safe Shutdown Analysis, could not be operated from the remote shutdown panel to safely shutdown the unit in the event of a fire in area 24. The following are examples of components that would not operate properly from the remote shutdown panel:

- 2E11F003B, Residual Heat Removal System Heat Exchanger Outlet valve, would not open from the remote shutdown panel.
- 2E11F017B, Residual Heat Removal System Low Pressure Coolant Injection Outboard Injection Valve, would not cycle from the remote shutdown panel.
- 2E11F004B, Residual Heat Removal Pump 2B Torus Suction Valve, would not open from the remote shutdown panel.
- The open interlock between 2E11F004B, Residual Heat Removal Pump 2B Torus Suction Valve, and 2E1F006B (sic), Residual Heat Removal Shutdown Cooling Suction Valve, was incorrectly installed allowing two valves to open simultaneously.

Enclosure

Violation 95-26-01 and GPC Response

2B31F023B, Reactor Water Recirculation Pump 2B Suction Isolation Valve, would not cycle from the remote shutdown panel.

- .. 2E11-F006A (sic), Residual Heat Removal Shutdown cooling (sic) Suction Valve, would not open from the remote shutdown panel.

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

This violation is applicable to Unit 2 only.

RESPONSE TO VIOLATION 95-26-01

Reason for the violation:

The causes of this violation were failure to perform periodic testing of the remote shutdown panel transfer and control circuits and, in one case, inadequate design and design change functional testing. Additionally, routine operational activities did not involve the remote shutdown panel; thus, no previous failures had been identified with the system. As a consequence, periodic reliability testing of the circuits had not been performed. Instrumentation, however, was being calibrated and periodically functionally tested.

Prior to 7/13/95, the Unit 2 Technical Specifications did not require testing of the RSDP transfer and control circuits. Plant E. I. Hatch was a lead plant in the implementation of the Improved Technical Specifications (ITS) and on 7/13/95, implemented them. ITS included requirements for performing surveillance tests on the RSDP transfer circuits and controls. The RSDP, with NRC concurrence, did not have to be tested until the next scheduled outage.

Residual Heat Removal System Low Pressure Coolant Injection Outboard Injection Valve 2E11-F017B would not cycle from the remote shutdown panel because a design error had been introduced in 1992. The design change which contained the error involved modifying wiring in the valve's Motor Control Center. The design specified that a particular control wire be terminated on a specific terminal. This control wire, even though not located in the remote shutdown panel, was supposed to have provided power to the valve control logic when valve control was at the remote shutdown panel. However, with the wire terminated per the erroneous design, the remote shutdown panel control logic would not have power when control was transferred to the remote shutdown panel. This design error had no effect on operation of the valve from the Motor Control Center. The functional test involved cycling the valve from the Motor Control Center only and, therefore, did not reveal this condition.

Corrective steps which have been taken and the results achieved:

As a result of the problems with operation of Unit 2 remote shutdown panel equipment, the following corrective actions have been taken:

1. The aforementioned deficient conditions were repaired/corrected, including the design error introduced in 1992 under Design Change Request 87-150.
2. The required Technical Specifications testing was satisfactorily completed from the remote shutdown panel. The remote shutdown panel was returned to operable status prior to reactor startup from the refueling outage.
3. The surveillance testing of the Unit 2 transfer and control circuits will be performed at the frequency required by the Technical Specifications.
4. On-line testing of the Unit 1 remote shutdown panel transfer and control circuits was completed, to the extent practical, during power operation on 12/5/95. One problem was identified during the testing that affected component operability. Specifically, the control power fuse for the "G" Safety/Relief Valve was found blown, rendering the "G" Safety/Relief Valve inoperable. It is not known when or why the fuse blew. It was replaced and the circuit was subsequently tested satisfactorily. This condition did not affect the "C" Safety/Relief Valve, which is redundant to the "G" Safety/Relief Valve. Consequently, the ability to depressurize the reactor vessel was not affected by this condition. Future surveillance testing of the Unit 1 transfer and control circuits will be performed at the frequency required by the Technical Specifications.

Corrective steps which will be taken to avoid further violations:

No additional corrective actions to prevent further violations are necessary at this time.

Date when full compliance will be achieved:

Full compliance was achieved prior to startup from the Unit 2 refueling outage in November 1995 when the required Technical Specifications testing was completed satisfactorily and the Unit 2 remote shutdown panel controls were returned to operable status.