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Georgia Power
the southern electric system

September 28, 1995

Docket No. 50-321

HL-5034

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

Edwin I. Hatch Nuclear Plant - Unit 1
Reply to a Notice of Violation

Gentlemen:

In response to your letter dated August 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 95-16. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Sincerely,

J. T. Beckham, Jr.

OCV/jp

Enclosure: Violation 95-16-01 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. Ebneter, Regional Administrator
Mr. B. L. Holbrook, Senior Resident Inspector - Hatch

IE01

Enclosure

Edwin I. Hatch Nuclear Plant - Unit 1
Violation 95-16-01 and GPC Response

VIOLATION 95-16-01

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

Procedure 52CM-MME-001-0S: Repacking Valves And The Adjustment of Valve Packing, Revision 8, Section 7.5, Packing Installation, delineates the necessary process to correctly repack valves.

Procedure 52CM-MME-011-0S: Gate and Globe Valve Repair, Revision 8, Section 7.9, Reassembly of Gate Valves And Globe Valves With Pressure Seals, delineates the necessary steps to correctly reassemble gate and globe valves.

Contrary to the above, from October 12 to 15, 1994, maintenance to valve 1E41-F003, High Pressure Coolant Injection Steam Isolation Valve, was not accomplished in accordance with procedures 52CM-MME-001-0S and 52CM-MME-011-0S, as evidenced by a valve failure on July 7, 1995. Visual inspection of the failed valve revealed that it was not correctly repacked and reassembled in that the valve bonnet was not properly aligned; and that significant damage had occurred to the valve packing, packing components, valve components, and valve internals.

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

This violation is applicable to Unit 1 only.

RESPONSE TO VIOLATION 95-16-01

Reason for the violation:

This violation was caused by personnel error on the part of non-licensed, contractor personnel. Contract personnel hired to assist in performing refueling outage maintenance failed to correctly reassemble valve 1E41-F003.

Maintenance was last performed on the valve in October of 1994; this work was performed by contract personnel. The work history description for the October maintenance activity and the as found condition of the valve, indicated that the bonnet was installed incorrectly. Specifically, the valve bonnet was not seated correctly on the valve

guide pin when it was installed in 1994. This allowed the valve guide to move in the valve body, resulting in the wedge binding on the guide ribs and galling the upper portion of the guide ribs.

Additionally, a rigid carbon spacer ring was found crushed at the bottom of the packing stuffing box. A packing ring or steel ring should have been installed instead of the rigid carbon spacer ring because of a taper in the bottom of the stuffing box. It is likely that the carbon ring cracked upon being pressed against the tapered bottom. After several valve cycles, the carbon fragments could have been drawn into the stem-bonnet interface by the stem, starting the galling process. It is also possible that the carbon ring initially was preventing the stem from contacting the misaligned bonnet. However, when the carbon ring became significantly damaged after repeated cycling of the valve, the stem then contacted the bonnet, starting the galling process. Ultimately, the valve components galled to the point that they became bound. More information is provided in LER 50-321/1995-006, dated August 7, 1995.

Corrective steps which have been taken and the results achieved:

The valve stem was replaced, the bonnet and valve guide ribs were repaired, and the valve was packed correctly. The valve subsequently was tested satisfactorily in accordance with plant surveillance procedure 34SV-E41-001-1S, "HPCI Valve Operability," and returned to service. The HPCI system was then returned to service on 7/16/95 at 1740 EDT.

The individuals who performed maintenance on the valve were contractors and are not employed with Georgia Power Company. However, the contractor site representatives have been counseled regarding the adequacy of maintenance on the valves.

Corrective steps which will be taken to avoid further violations:

No additional corrective actions to avoid further violations are considered necessary.

Date when full compliance will be achieved:

Full compliance was achieved on 7/16/95 when valve 1E41-F003 was repaired and successfully functionally tested and the HPCI system was returned to service.