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Georgia Power
the southern electric system

HL-2361
003833

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

PLANT HATCH - UNIT 1
NRC DOCKET 50-321
OPERATING LICENSE DPR-57
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

In response to your letter of July 23, 1992 and in accordance with the provisions of 10 CFR 2.201, Georgia Power Company (GPC) is providing the enclosed response to the Notice of Violation associated with Inspection Report 92-15. A copy of this response is being provided to NRC Region II for review. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Should you have any questions in this regard, please contact this office.

Sincerely,


J. T. Beckham, Jr.

JKB/cr

Enclosure

cc: Georgia Power Company
Mr. H. L. Sumner, General Manager - Nuclear Plant
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. G. Ebner, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

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ENCLOSURE

PLANT HATCH - UNIT 1
NRC DOCKET 50-321
OPERATING LICENSE DPR-57
VIOLATION 92-15-01 AND GPC RESPONSE

VIOLATION 92-15-01

Technical Specification (TS) 6.8.1.c requires that written procedures be established, implemented, and maintained as recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.

Section 1.d of Appendix "A" of Regulatory Guide 1.33, recommends procedures for procedural adherence. Section 9 of Regulatory Guide 1.33 recommends procedures for maintenance activities.

Procedure 10AC-MGR-003-0S: Preparation and Control of Procedures, requires step by step procedural compliance when performing activities controlled by a procedure. Special Purpose procedures are specifically addressed by 10AC-MGR-003-0S.

Special Purpose (SP) Procedure: 42SP-042892-RU-1-1N: Functional Testing of the Hydrogen and Oxygen Injection System, provided instructions for testing of the recently installed hydrogen injection system. Step 7.12.18 requires the sliding link to be closed.

Contrary to the above, on June 24, 1992, step 7.12.18 of 42SP-042892-RU-1-1N was not performed in sequence, in that, a jumper was removed from the contacts of the sliding link prior to closing the link which initiated an unexpected major plant transient.

This violation is applicable to Unit 1 only.

This is a Severity Level IV violation (Supplement I)

RESPONSE TO VIOLATION 92-15-01

Admission or denial of the violation:

The violation occurred as described in the Notice of Violation.

ENCLOSURE (Continued)

VIOLATION 92-15-01 AND GPC RESPONSE

Reason for the violation:

The violation was caused by personnel error. Plant Modification and Maintenance Support (PM&MS) engineering personnel performing special purpose procedure 42SP-042892-RU-1-1N, "Hydrogen & Oxygen Injection System Functional Test," failed to follow the procedure. Specifically, they failed to close links DD-83 and DD-84 in Main Control Room panel 1H11-P612 as required by step 7.12.18 of the procedure. Instead, they stopped performance of the procedure at this step so they could restore Temporary Modification (TMM) 1-92-51. The links had been opened on 6/3/92 by TMM 1-92-51. Restoration of the TMM required that links DD-83 and DD-84 be closed and the jumper between the two links be removed. The actual removal of the jumper, however, was not covered by the special purpose procedure or the TMM and, therefore, was outside the scope of both documents.

The removal of this jumper was covered by Design Change Request 88-304 using Work Process Sheet 88-304-E014. The Work Process Sheet also required that the links be closed prior to the jumper being removed. However, PM&MS personnel failed to follow the requirements of the Work Process Sheet. They removed the jumper, which was outside the scope of the special purpose procedure, prior to closing links DD-83 and DD-84 which was required by the special purpose procedure.

Corrective steps which have been taken and the results achieved:

PM&MS personnel have been counseled regarding their inappropriate actions and the consequences of those actions.

The PM&MS Department has issued a directive informing appropriate personnel that special purpose procedures are to be followed step by step.

Corrective steps which will be taken to avoid further violations:

The PM&MS Department will review and revise, as necessary, the appropriate Administrative Control and department procedures to ensure that plant activities not controlled by a clearance boundary, which could result in transients to operating equipment, will be governed by a special purpose procedure. This action will be completed by 9/30/92.

Date when full compliance will be achieved:

Full compliance was achieved on 6/24/92 at approximately 1326 CDT when the jumper was returned to its proper location in panel 1H11-P612.