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Georgia Power

the southern electric system

L. T. Gucwa
Manager Nuclear Engineering
and Chief Nuclear Engineer

NED-85-074
1407N

February 6, 1985

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
101 Marietta Street, NW
Atlanta, Georgia 30323

REFERENCE:
RII: JAO
I&E Report
50-321/84-49
50-366/84-49

ATTENTION: Regional Administrator

GENTLEMEN:

Georgia Power Company hereby provides the following information in response to the violation cited in NRC I&E Report 50-321/84-49 and 50-366/84-49 dated January 14, 1985. The subject violation was identified during the NRC inspection conducted at Plant Hatch by Mr. B. R. Crowley of your staff on December 3-6, 1984 and applied only to Plant Hatch Unit 1.

VIOLATION

Technical Specification 6.8.1.a and paragraph 9.e. of Appendix "A" to Regulatory Guide 1.33, Revision 2 require that general procedures be implemented for control of maintenance, repair and modification work. Site procedure HNP-6916, the applicable procedure for control of welding material during repair, requires:

- a. That bare welding wire be stored in the warehouse in a manner to preclude mixing with other materials.
- b. That the heat or lot number of welding material be entered on the Inventory Material Request when issuing the material from the warehouse.
- c. That welding material be stored in the tool room in a manner to preclude mixing with other materials.
- d. That the person issuing welding material from the tool room record the heat or lot number of material on the Weld Material Requisition.
- e. That the welder verify the type of welding material received from the tool room.

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VIOLATION (Continued)

Contrary to the above, on November 30, 1984, general procedures for control of repair work were not properly implemented in that: inconel welding wire was stored with identically boxed stainless steel welding material in the warehouse and tool room; warehouse personnel and tool room personnel entered a heat number for inconel material on a stainless steel Inventory Material Request and Weld Material Requisition and issued inconel material for stainless steel; and the welder did not verify the type of welding material issued. These procedure violations resulted in inconel material, in lieu of the required stainless steel, being used to weld 2 1/2 passes on RECIRC system overlay weld 28-A-10.

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

RESPONSE

Admission or denial of alleged violation: The violation occurred.

Reason for the violation: The welding of inconel material on Recirc system overlay weld 28-A-10, in lieu of the required stainless steel, was the result of a series of personnel errors involving a failure to follow procedure. The inconel material was improperly stored and issued in both the warehouse and toolroom due to a failure to pay attention to detail by key personnel. Welding personnel incorrectly assumed that because the inconel spools of wire were packaged in boxes identical to the boxes of stainless steel wire, only stainless steel spools were available.

Corrective steps which have been taken and the results achieved: A Limiting Condition for Operation (LCO) was initiated upon discovery. The inconel filler was ground out and the affected area acid etched to verify total removal of the inconel per procedure HNP-1-10273. All warehouse, toolroom, and welding personnel involved were counselled by their supervisors. In addition, the responsible personnel participated in a seminar on performance of the weld material control procedure and attention to detail.

Corrective steps which will be taken to avoid future violations: The above actions are sufficient to prevent recurrence.

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RESPONSE (Continued)

Date when full compliance was achieved: Full compliance was achieved on December 21, 1984, when the weld was fully repaired.

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

Sincerely yours,

L. T. Gucwa

L. T. Gucwa

JAE/mb

xc: J. T. Beckham, Jr.
H. C. Nix, Jr.
Senior Resident Inspector