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HL-2315
003718

July 17, 1992

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

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

Gentlemen:

In response to your letter of June 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 NRC Inspection Report 92-12. 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.

Sincerely,

J. T. Beckham, Jr.

MCM/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. D. Ebneter, 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 92-12-01 AND GPC RESPONSE

VIOLATION 92-12-01

Unit 1 Technical Specifications 3.7.D.1 requires that during power operation, all primary containment isolation valves and all reactor coolant system instrument line excess flow check valves be operable.

Contrary to the above, on May 7, 1992, excess flow check valve 1B21-F051C was inoperable in that it was bypassed for approximately 18 hours.

This is a Severity Level IV violation (Supplement 1).

This violation is applicable to Unit 1 only.

RESPONSE TO VIOLATION 92-12-01

Admission or denial of the violation:

The violation occurred as described in the Notice of Violation.

Reason for the violation:

The violation was caused by an inadequate procedure. The position of the control switch for excess flow check valve 1B21-F051C was not adequately controlled by procedure. As a result, the valve was inadvertently bypassed for approximately 18 hours.

Procedure 64CH-SAM-007-0S, "Automated Sampling/In-Line Analyses of Reactor Coolant and Containment Atmosphere," provides instructions for operating the Post-Accident Sampling System. The system is operated monthly using this procedure to verify it is functional and can be used to obtain and analyze a reactor coolant sample as it would be required to do following an accident. The procedure contained a step to place the control switch for excess flow check valve 1B21-F051C to the open position, thus bypassing the excess flow check valve via an internal bypass line, so that reactor coolant flow and pressure could be established to the Post-Accident Sampling System. (This is necessary because a large differential pressure exists across the excess flow check valve causing it to close per its design when the Post-Accident Sampling System is first placed into service.) However, the procedure did not contain a step to return the valve's control switch to the auto position after flow and pressure were established. Consequently, the valve was inadvertently left in the

bypassed condition for approximately 18 hours until Operations personnel noted the switch was in the open position and returned it to the auto position, closing the internal bypass line and restoring the valve to an operable status.

Corrective steps which have been taken and the results achieved:

On 5/7/92, as an interim action, Clearances 1-92-539 and 2-92-281 were issued on the control switches for excess flow check valves 1B21-F051C and 2B21-F051C, respectively, administratively preventing them from being moved from the auto position. (These are the only two excess flow check valves with control switches which can be left in the open position. All other excess flow check valves have only push buttons which spring return to the closed position when released.) The clearances will remain in place until procedure 64CH-SAM-007-OS can be revised.

Corrective steps which will be taken to avoid further violations:

Procedure 64CH-SAM-007-OS will be revised to add a step to require that the control switches for excess flow check valves 1B21-F051C and 2B21-F051C be returned to the auto position and independently verified after the required Post-Accident Sampling System flow and pressure are established. A caution will also be added to the procedure informing personnel that placing the switches in the open position renders these excess flow check valves inoperable and that appropriate Technical Specifications action statements must be entered while the switches are in the open position.

Date when full compliance will be achieved:

Full compliance was achieved on 5/7/92 at 0700 CDT when the control switch for excess flow check valve 1B21-F051C was placed in the auto position thus restoring the valve to an operable status.