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L. T. Gucwa Manager Nuclear Engineering and Chief Nuclear Engineering 84 NOV 14 P2: 49

NED-84-571

November 8, 1984

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

REFERENCE: RII: RCL 50-321/50-366 I&E Inspection 84-34

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

Georgia Power Company hereby provides the following information in response to the violation cited in NRC I&E Report 50-321/84-34 and 50-366/84-34 dated October 9, 1984. The subject violation was identified during the NRC inspection conducted at Plant Hatch Units 1 and 2 by Mr. R. V. Crlenjak of your staff on August 21 - September 20, 1984.

VIOLATION:

Technical Specification 6.8.1 requires that procedures be established, implemented and maintained covering safety-related activities.

Contrary to the above, on August 25, 1984, procedure HNP-2-3240, Low-Low Set Reactor Instrument Functional Test and Calibration was not properly implemented in that test valve (TV1) and isolation valve (TV1) were not properly aligned during system restoration for instruments 2B31-N12OC, 2B21-N12OD and 2B21-N12OB. The out of position valves were signed for as being independently verified in position.

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

RESPONSE:

Admission or denial of alleged violation: The violation occurred.

Reason for the violation: Due to personnel error valves were mispositioned on four pressure transmitters. This resulted in operation outside the limits specified in Technical Specifications 3.3.2, table 3.3.2-1(5C), and specification 3.4.2.2.

Corrective steps which have been taken and the results achieved: During the performance of procedure HNP-2-1004, "RPS and BCCS Instrument Valve Lineup", technicians determined that the four instrument valves had been placed in the incorrect position. The instrument valves were immediately returned to their proper configuration per procedure HNP-2-1004. After a thorough

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RESPONSE: (Continued)

security investigation, the misalignment of the valves was confirmed to be due to personnel error. The plant personnel responsible for the misalignment of the valves were disciplined. All on-site personnel, excluding clerks, have been given training via a Management Departmental Directive on Independent Verification of safety related valves. Additionally, the remaining Reactor Protection System (RPS) and Emergency Core Cooling System (ECCS) instrumentation was inspected for proper valve position and verified to be satisfactory per HNP-2-1004 on August 30, 1984. In addition, the need for closer supervisory involvement in work activities of subordinates was discussed with line supervisors during a series of regular meetings which has been instituted.

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

Date when full compliance was achieved: Full compliance was achieved on August 30, 1984, when the instrument valves were placed in their proper positions and other RPS and ECCS instrumentation valves were verified to be in their proper position.

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

Very truly yours,

F.T. Show

L. T. Gucwa

MJB

xc: H. C. Nix, Jr. Senior Resident Inspector