

SEP 23 1992

*Official*

Docket Nos. 50-321, 50-366  
License Nos. DPR-57, NPF-5  
EA 92-161

Georgia Power Company  
ATTN: Mr. W. G. Hairston, III  
Senior Vice President  
Nuclear Operations  
Post Office Box 1295  
Birmingham, Alabama 35201

Gentlemen:

SUBJECT: NOTICE OF VIOLATION AND ENFORCEMENT CONFERENCE SUMMARY (NRC  
INSPECTION REPORT NOS. 50-321/92-20 AND 50-366/92-20)

This refers to the Nuclear Regulatory Commission (NRC) inspection conducted by Mr. R. Shortridge on August 17 - 19, 1992, at the Hatch Nuclear Plant. The inspection included a review of the facts and circumstances related to high radiation area doors being left open and unattended, two instances of personnel entering high radiation areas, and an individual improperly exiting the Radiation Control Area. The inspection report documenting this inspection was sent to you by letter dated September 8, 1992. As a result of this inspection, three apparent violations of NRC requirements were identified. An Enforcement Conference was held on September 16, 1992, in the NRC Region II office to discuss the violation regarding high radiation doors, its cause, and your corrective actions to preclude recurrence. This Enforcement Conference was open for public observation in accordance with the Commission's trial program for conducting open Enforcement Conferences as discussed in 57 FR 30762, July 10, 1992. A list of the Enforcement Conference attendees and a copy of the information you provided at the Conference is enclosed.

Violation A in the enclosed Notice of Violation (Notice) involved a high radiation area door being left open and unattended on July 31, 1992. High radiation area doors have been found open and unattended in the past at Plant Hatch, and you have taken steps to prevent recurrence as outlined in NRC Inspection Report 50-321/92-20 and 366/92-20 and during the Enforcement Conference. We also recognize that your surveillance program had detected these doors being unlocked and open in all cases. In addition, at the Conference you pointed out that the door left unlocked on July 31, 1992, was part of a scheduled replacement program, which would not be completed until December 31, 1992 as implied in your letter dated May 15, 1991. The NRC is concerned, however, that your interim actions to date have not prevented high radiation area doors that have not been changed as a result of this program from being unlocked. For example, the door left unlocked on July 31, 1992, had previously been left open and unattended on five other occasions; July 11, 1990, August 14, 1990, February 12, March 19, and April 12, 1992.

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On April 15, 1991, a Notice of Violation was issued containing a Severity Level IV violation for four locked high radiation area doors that had been left open and unattended during the period June 23, 1990 - December 9, 1990. This violation was considered similar to a violation cited in a Notice of Violation issued on December 11, 1989, which involved an example of a high radiation area door being unlocked and unattended. A concern was expressed in the letter of April 15th that addressed recurring violations and the expectation that licensees learn from their past failures and take effective corrective actions. The April 15th letter also mentioned the possibility that future incidents could result in escalated enforcement action for similar violations. Inspection Report Nos. 50-321/91-33 and 50-366/91-33, dated December 30, 1991, documented a locked high radiation area door that was found open and unattended on December 2, 1991. The NRC characterized this event as another example of the violation cited in Inspection Report Nos. 50-321/91-05 and 50-366/91-05 dated March 6, 1991. Inspection Report Nos. 50-321/92-12 and 50-366/92-12 dated June 23, 1992, documented four additional instances of open and unattended locked high radiation area doors, one on February 12, 1992, one on March 19, 1992, and two which occurred on April 12, 1992. These four instances were characterized as a violation of 10 CFR 20.203(c)(2)(iii), and identified as a non-cited violation.

After consideration of the information provided at the Enforcement Conference and after consultation with the Director, Office of Enforcement, we have decided not to propose a civil penalty in this case because of the extensive actions taken and in progress to correct the problem. Corrective actions which have been wide-ranging included, repairing mechanical problems with doors, daily checks of doors, quarterly checks of the material condition of the doors, revision of the key sign-out forms, upgrade and replacement of doors, issuance of various forms of correspondence by senior plant managers to plant personnel discussing the control of locked high radiation area doors and possible disciplinary actions for future infractions, and training for plant personnel on the requirements of entry into high radiation areas. In a memorandum to all personnel dated May 11, 1992, the General Manager succinctly defined the problem when he stated "Finding a door unsecured clearly indicates that the last individual through the door did not check to see if the door was fully closed behind him. The regulations allow no margin for having a high radiation door left unsecured."

Violation B in the enclosed Notice involved two examples where individuals entered a high radiation area on May 15, 1991 and January 23, 1992, without either a radiation monitoring device to continuously monitor the radiation dose rate, or a radiation monitoring device to continuously integrate the radiation dose rate in the area and alarm when a preset dose rate was received, or an individual qualified in radiation protection procedures equipped with a radiation dose rate monitoring device. We recognize that both incidents were identified by your staff, however, recurring violations are of particular concern to the NRC because they indicate that corrective actions

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Although there was a third apparent violation in the September 8, 1992 inspection report, we have not made a final decision as to whether it will be characterized as a violation. The apparent violation involved an event where an individual may have not properly surveyed prior to exiting the Radiation Controlled Area. The NRC continues to pursue information regarding the circumstances surrounding the actual surveys and exit. Therefore, this item is currently classified as an unresolved item (URI No. 321, 366/92-20-03).

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Should you have any questions concerning this letter, please contact us.

Sincerely,



J. Philip Stohr, Director  
Division of Radiation Safety  
and Safeguards

Enclosures:

1. Notice of Violation
2. Enforcement Conference  
Presentation Material
3. List of Attendees

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<del>RII:DRSS</del> <i>for</i> RShortridge 9/22/92	<del>RII:DRSS</del> JPotter 9/22/92	<del>RII:DRSS</del> WCline 9/22/92	<del>RII:DRSS</del> JStohr 9/22/92	<del>RII:DRP</del> EMerschoff 9/23/92	<del>RII:ORA</del> CEvans 9/23/92	NOT IN OFFICE
RII:EICS GJenkins 9/23/92	<del>RII:ORA</del> LReyes 9/23/92					