

SEP 23 1992

ENCLOSURE 1

NOTICE OF VIOLATION

Georgia Power Company  
Hatch Nuclear Plant  
Units 1 and 2

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

During an NRC inspection conducted on August 17 - 19, 1992, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C the violations are listed below:

- A. 10 CFR 20.203(c)(2)(iii) requires that, each access point to a high radiation area shall be maintained locked except during periods when access to the area is required, with positive control over each individual entry.

Technical Specification 6.12.2 requires that in addition to the requirements of Technical Specification 6.12.1, each high radiation area in which the intensity of radiation is greater than 1,000 millirem per hour (mrem/hr) to have locked doors provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Laboratory Foreman on duty.

Licensee Radiation Protection procedure, 62RP-RAD-016-OS, Attachment 2, High Radiation Area, High Radiation Door Check, Revision 6, lists doors which must remain locked unless authorized by a Health Physics Foreman, to control access to both high radiation areas and areas where the probability exists that high radiation areas may form during normal plant operations.

Contrary to the above, on July 31, 1992, the licensee's door surveillance program identified locked high radiation area door 1R-32 (Reactor Water Cleanup Heat Exchanger Room) as being unlocked and unattended.

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

- B. Technical Specification 6.12.1 requires that in lieu of the "control device" or "alarm signal" required by Paragraph 20.203(c)(2) of 10 CFR Part 20, each high radiation area in which the intensity of the radiation is greater than 100 mrem/hr but less than 1,000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

1. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

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2. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such area with this monitoring device may be made after the dose rate levels in the areas have been established and personnel have been knowledgeable of them.
3. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the areas and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physics supervision in the RWP.

Licensee Administrative Control Procedure 60 AC-HPX-004-OS, Radiation and Contamination Control, Revision 11, dated July 7, 1992, repeats the above listed Technical Specification requirements.

Contrary to the above, in the following examples individuals entered a high radiation area without either; a radiation monitoring device which continuously indicates the radiation dose rate, or a radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset dose rate is received, or an individual qualified in radiation protection procedures equipped with a radiation dose rate monitoring device:

- a. On May 15, 1991, an individual was observed entering a high radiation area, Unit 2 Torus 114 elevation, Bays 8 and 9, after being instructed not to by the area health physics technician.
- b. On January 23, 1992, personnel entered the Unit 2 Condenser Bay, 112 elevation, a posted high radiation area without meeting these requirements.

Personnel involved in the events did not received significant exposure to radiation.

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

Pursuant to the provisions of 10 CFR 2.201, Georgia Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region II, and a copy to the NRC Senior Resident Inspector at the Hatch Nuclear Plant within 30 days of the date of this Notice of Violation. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps

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that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Atlanta, Georgia  
this 23 day of September 1992