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NED-85-025  
1347N

January 25, 1985

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

REFERENCE:  
RII: JPO  
50-321/50-366  
I&E Inspection Report  
84-46

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

Georgia Power Company (GPC) has investigated the circumstances of an alleged violation identified in Inspection Report 84-46. The following is our response to that violation.

VIOLATION:

10 CFR 50.54(a)(1) requires Georgia Power Company (GPC) to implement the quality assurance program described in its Safety Analysis Report. Section 17.2.5 of GPC QA program requires that activities affecting quality be prescribed by documented instructions and procedures. The program also requires that these activities be accomplished in accordance with these instructions and procedures.

Contrary to the above, procedure 50AC-MNT01-0, paragraph 8.5.14 requires additional instructions when the scope of work in a maintenance activity is expanded. This was not accomplished when a deficient condition was identified and corrected during performance of maintenance Work Orders 1-84-2086 and 1-84-5858.

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

RESPONSE:

Admission or denial of the alleged violation: The violation occurred.

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Reasons for the violation if admitted: The violation occurred because of a failure to follow the requirement for a Deficiency Report (DR) when a hardware type deficiency exists which cannot be corrected through normal working procedures. A DR was not written in this case because the maintenance personnel involved had previously contacted the vendor and had received verbal instruction relative to repair of the fire pump. There was a misunderstanding of the requirement: personnel involved assumed that the vendor instruction was adequate, and that there was no need to obtain concurrence from the Hatch engineering organization through a DR.


Corrective steps which have been taken and the results achieved: An updated manual for this pump was requested from the vendor, and was received on the plant site on December 4, 1984. While this corrective action does not directly address the violation, it will eliminate the deficient condition which subsequently led to the violation.

As corrective action which has been taken to address the specifics of the violation, engineering was contacted and approval for substitution of the gasket material was given on November 15, 1984. The Engineering Department approval was based on verbal instruction from the vendor.

All involved supervisory personnel have been counseled in the requirements for Deficiency Reports, and on the need to involve the engineering organization when there is a deficiency or a need to deviate from vendor-supplied materials or instructions.

Corrective steps which will be taken to avoid further violations: A deficiency report will be filed to formally document the resolution to the deficiency identified by the NRC in IER 84-46.

A program to improve control and use of vendor manuals has been under way at Plant Hatch. We are cognizant of an Institute of Nuclear Power Operations (INPO) good practice document on the subject of vendor manuals, and we intend to implement applicable recommendations at Plant Hatch. While not directly responsive to this violation, the program is expected to reduce deficiencies in vendor supplied information. This will further reduce the likelihood similar violations.

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Date when full compliance will be achieved: Full compliance with the specifics of the violation was achieved on November 15, 1984 when the deficient condition was reported to the Engineering Department. A DR to formally close the issue will be written and processed prior to March 1, 1985.

Very truly yours,



L. T. Gucwa

PLS/mb

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