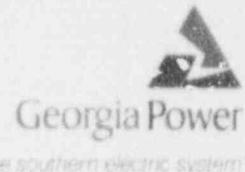


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HL-3044
004344

December 7, 1992

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

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

In response to your letter of November 6, 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 Inspection Report 92-22. 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.

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

Sincerely,

J. T. Beckham, Jr.

JKB/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. Ebner, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

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ENCLOSURE 1

PLANT HATCH - UNITS 1 AND 2
NRC DOCKETS 50-321 AND 50-366
OPERATING LICENSES DPR-57 AND NPF-5
VIOLATION 92-22-01 AND GPC RESPONSE

VIOLATION 92-22-01

Hatch Unit 2 TS 3.9.5.2 requires that secondary containment ventilation system automatic isolation dampers 2T41-F003A, F003B, F023A, and F023B shall be operable in operational condition 5 and when irradiated fuel is being handled in the Hatch Unit 1 secondary containment.

Hatch Unit 1 TS 3.7.C requires that secondary containment integrity shall be maintained during all modes of Unit 1 operation except when certain conditions are met. These conditions include the provisions that irradiated fuel is not being moved in the reactor building and the Unit 1 reactor is subcritical.

The TS definition of secondary containment integrity specifies that all automatic ventilation system isolation valves be operable or secured in the isolated position.

Contrary to the above, from approximately 1:30 a.m. to 1:30 p.m. on September 30, 1992, dampers 2T41-F003A, F003B, F023A, and F023B were inoperable. The dampers failed to automatically shut on a low reactor vessel level following a Unit 1 reactor scram. Movement of irradiated fuel in the Unit 1 secondary containment was in progress during this period.

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

RESPONSE TO VIOLATION 92-22-01

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 a less than adequate design. The automatic isolation function of the dampers could be defeated by placing their control switches to the "open" position. No other secondary containment isolation dampers have switches which function in this manner.

At approximately 0130 EDT on 9/30/92, following clearance restoration activities, a licensed Operator moved the control switches for dampers 2T41-F003A and B and 2T41-F023A and B from "auto" to "open." The Operator used

ENCLOSURE 1 (Continued)

VIOLATION 92-22-01 AND GPC RESPONSE

procedure 3450-T41-006-2S, "Refueling Floor Ventilation System," to align the Unit 2 Refueling Floor Ventilation system to its normal configuration following restoration of a clearance. The procedure required that isolation dampers 2T41-F003A and B and 2T41-F023A and B be confirmed to be in the open position. Because the term "open" was capitalized in the procedure, the Operator thought the procedure required him to place the control switches for these dampers to the switch position labeled "open." He did this and the dampers opened as expected; and consequently, returned to their normal position. Due to an inadequate design, the automatic secondary containment isolation function of these dampers is overridden with the control switches in the "open" position. Hence, they could not close upon receipt of a secondary containment isolation signal per design and therefore were inoperable.

During review of the Safety Parameter Display System tape from the Unit 1 scram on 9/30/92, plant personnel noted that secondary containment isolation dampers 2T41-F003A and B and 2T41-F023A and B did not close as required. Investigation into this problem revealed the dampers' control switches were in the incorrect position. At approximately 1330 EDT on 9/30/92, the control switches were placed in the "auto" position, restoring the dampers to an operable status.

Corrective steps which have been taken and the results achieved:

As a result of this event, a clearance was placed on the control switches for dampers 2T41-F003A and B and 2T41-F023A and B to administratively maintain the switches in the "auto" position. This was done on 10/1/92. It was determined that a similar problem did not exist for the Unit 2 reactor building secondary containment and the Unit 1 refueling floor and reactor building secondary containment isolation dampers because these dampers do not have control switches.

Corrective steps which will be taken to prevent further violations:

A design change will be implemented by 5/31/93 to remove the ability to override the automatic isolation function for dampers 2T41-F003A and B and 2T41-F023A and B when they are in the open position. Until the design change can be implemented, appropriate administrative controls will remain in place to ensure the dampers remain operable.

Date when full compliance will be achieved:

Full compliance was achieved on 9/30/92 at approximately 1330 EDT when the control switches for dampers 2T41-F003A and B and 2T41-F023A and B were returned to the "auto" position thereby restoring the dampers to an operable status as required by the plant's Technical Specifications.

ENCLOSURE 2

PLANT HATCH - UNIT 2
NRC DOCKET 50-366
OPERATING LICENSE NPF-5
VIOLATION 92-22-02 AND GPC RESPONSE

VIOLATION 92-22-02

Hatch Unit 2 Technical Specification (TS) 3.9.6 requires that direct communications be maintained between the control room and the refueling platform personnel during core alterations. As stated in the TS bases, this communications capability ensures that personnel involved in the refueling activities can be promptly informed of significant changes in the facility status or core reactivity condition during fuel movement within the reactor vessel.

Contrary to the above, on September 22, 1992, direct communications and monitoring requirements were not maintained between the control room and the refueling platform personnel during core alterations in that the operator assigned to perform these duties was inattentive. This condition was observed to exist for several seconds before corrective actions were initiated by the inspector.

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

This violation is applicable to Unit 2 only.

RESPONSE TO VIOLATION 92-22-02

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 personnel error. The operator assigned the task of maintaining communication with refueling platform personnel failed to remain alert and attentive to his duties. He had not worked an excessive amount of overtime nor had he rotated through different shifts (night, day, evening) prior to this event. In fact, he had worked normal, eight-hour day shifts for the preceding week and a half. Therefore, fatigue from overtime and/or sleeping pattern disruptions from changes in shift schedule were not factors in this event.

ENCLOSURE 2 (Continued)

VIOLATION 92-22-02 AND GPC RESPONSE

Corrective steps which have been taken and the results achieved:

As a result of this event, the following actions have been taken:

1. The operator was removed from licensed duties. Additionally, he was formally disciplined under GPC's Positive Discipline Program.
2. This event was reviewed with each operations shift crew. The importance of remaining alert was stressed and the need for the crews to take actions necessary to ensure that crew members remained alert was emphasized.
3. Operations management performed checks during back shifts to observe the attentiveness of operations shift crew members. No problems were found.

Corrective steps which will be taken to prevent further violations:

No additional corrective actions are necessary at this time to prevent further violations.

Date when full compliance will be achieved:

Full compliance was achieved on 9/22/92 at approximately 1455 EDT when the operator was made attentive. He had assumed his station at approximately 1445 EDT; therefore, the violation of Unit 2 Technical Specifications requirements existed for only 10 minutes.