

Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-6526

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

L. T. Guowa
Manager Nuclear Engineering
and Chief Nuclear Engineer

35 MAY 7 9:57



NED-85-322
1594N

April 29, 1985

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

REFERENCE:
RII: RCW
50-321/50-366
IER 85-07

ATTENTION: Dr. J. Nelson Grace

GENTLEMEN:

Georgia Power Company hereby provides the following information in response to the alleged violations cited in NRC I&E Report 50-321/85-07 and 50-366/85-07 dated April 1, 1985. The subject violations were identified during the NRC inspection conducted at Plant Hatch by Mr. K. E. Brockman, Mr. D. P. Falconer, and Mr. K. Poertner of your staff on February 5-7, 1985.

Violation 1:

10 CFR 55.10(d) requires that each application for an operator license shall contain complete and accurate disclosure as to all matters and things required to be disclosed. Application is made utilizing NRC Form 398.

Contrary to the above, the licensee submitted two applications for Senior Operator licenses which contained inaccurate information.

- a. One application for an initial license re-examination stated that the applicant had previously been examined by the NRC in July 1984; in actuality, the applicant was previously examined in September 1984. This inaccuracy did not affect the candidate's eligibility.
- b. One application for a license renewal stated that between September 1981 and December 1981, the applicant participated in a Shift Technical Advisors' (STA) training program which included four weeks of simulator training. In fact, the applicant did not receive simulator training until May 1982, and it consisted of 14 days of instruction. This training met the requirements of all licensing regulations.

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

8506210383 850429
PDR ADOCK 05000321
G PDR

IE01

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
April 29, 1985
Page Two

Response To Violation 1:

Admission or denial of alleged violation: The violation is denied.

Rationale for denial: The information supplied in the application for an initial license re-examination and in the application for license renewal was inaccurate, but the inclusion of such information in the applications did not violate 10 CFR 55.10(d). 10 CFR 55.10(d) states, in part, that the application "shall contain complete and accurate disclosures as to all matters and things required to be disclosed" (emphasis supplied). 10 CFR 55.10(a), together with Form 398, establish these "matters and things" which are required to be disclosed. The specific item of information supplied which is alleged to constitute a violation, i.e., the date of the previous examination, does not appear to be "required to be disclosed" by Form 398 or 55.10(a). Significantly, the omission of any specific date of prior examination would not have made Form 398 incomplete or violate 55.10(d). The information was provided in accordance with the verbal request of the NRC's Examining Branch to provide as much administratively helpful information as possible. As recognized by the Notice of Violation, this inaccuracy did not affect the candidate's eligibility.

With respect to Item 1b, the STA simulator training did not affect, and was not required for, the candidate's eligibility for license. Again, the supplied information was not "required to be disclosed", but simply was gratuitously made to assist NRC administration. Although perhaps subject to misinterpretation, the statement alleged to be inaccurate correctly states that the applicant participated in a STA training program. However, the particular applicant did not complete the four week simulator training (i.e., half classroom, half simulator manipulations) in this program. Instead, the applicant completed full-time simulator manipulations (i.e., no classroom) for 14 days in May, 1982. The 14 days of simulator manipulations are at least equivalent to four weeks of half-day simulator manipulations.

With regard to both Items 1a and 1b, a Severity Level IV Violation as contemplated in examples set forth in 10 CFR 2 Appendix C, Supplement I requires, relative to these occurrences, a "failure to meet regulatory requirements that have more than minor safety or environmental significance." In light of the Notice's

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
April 29, 1985
Page Three

acknowledgement that 1) the inaccuracy on the re-examination application did not affect the candidates eligibility, and 2) the training of the applicant did meet the requirements of all licensing regulations, the precondition of "more than minor safety significance" cannot credibly be contended to exist. At most, the inaccuracies, referred to as "discrepancies" in the Inspection Report (see page 5), are of a minor nature resulting from good faith efforts to supply information in addition to that which is "required to be disclosed."

Actions Taken: Notwithstanding the denial, we have taken the following actions. The responsible individuals have been instructed regarding accuracy in license applications. Additionally, a more detailed review of the applications will be conducted by supervisory personnel. The erroneous exam date on the re-examination application has been corrected. Action to clarify the license application statements was completed on April 18, 1985.

In processing future applications, notwithstanding GPC's sincere desire to accommodate the Examining Branch's request for non-required information to ease its administrative burden, information which is not required by either 10 CFR Section 50.55 or Form 398 will not be included in routine application submittals in order to assure our ability to effectively control our record keeping programs.

Violation 2:

The Nuclear Regulatory Commission Order to Georgia Power Company dated July 10, 1981, requires that the licensee implement the requirements of NUREG-0737, Items I.C.5 and II.B.4.

Contrary to the above, the licensee failed to implement the requirements of NUREG-0737 in that:

- a. NUREG-0737 Item I.C.5 requires that operational experience feedback be provided to maintenance personnel. Feedback of operating experience is controlled by procedure HNP-911,

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
April 29, 1985
Page Four

Operating Experience Assessment Report. The licensee's submittal dated December 15, 1980, responding to NUREG-0737 Item I.C.5 states that "all operating personnel" receive feedback of operating experience and that provisions exist to assure that appropriate personnel are informed, and documents and training programs upgraded.

Contrary to NUREG-0737 Item I.C.5, maintenance personnel are not addressed in HNP-911 and, therefore, do not receive operating experience feedback as required.

- b. NUREG-0737 Item II.B.4 states that the Plant Manager shall receive all the training indicated in Enclosure 3 to H. R. Denton's March 28, 1980 letter.

Contrary to NUREG-0737 Item II.B.4, the current plant manager has not received the training in mitigation of core damage specified in Enclosure 3 to H. R. Denton's March 28, 1980, letter.

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

Response To Violation 2a:

Admission or denial of alleged violation: The violation occurred, but not precisely as stated.

Reason for the violation: Feedback of operating experience to maintenance personnel was not addressed in procedure HNP-911. However, maintenance personnel were receiving operating experience feedback through the same information program implemented for licensed personnel under HNP-911. The Shift Technical Advisors (STA's) periodically assess, compile, and distribute relevant information to all licensed and operating personnel and training instructors.

Corrective steps which have been taken and the results achieved:

Subject to the Plant Hatch Procedure Upgrade Program, procedure HNP-911, is being revised and reformatted as an administrative control procedure 30AC-OPS-003.

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
April 29, 1985
Page Five

Corrective steps which will be taken to avoid further violations:

The revised procedure will address maintenance personnel and continue to provide operating experience feedback as required. Procedure 30AC-OPS-003 will be fully implemented by July 31, 1985.

Date when full compliance will be achieved: Full compliance will be achieved on July 31, 1985.

Response to Violation 2b:

Admission or denial of alleged violation: The violation occurred.

Reason for the violation: The plant manager did not receive the training in mitigation of core damage as per enclosure 3 to H. R. Denton's March 28, 1980, letter as a result of a misinterpretation of the Unit 2 Technical Specifications. Plant Hatch personnel misinterpreted the Technical Specifications Figure 6.2.2-1 on Unit Organization to mean that either the Plant Manager or Assistant Plant Manager should meet the requirements of NUREG-0737 Item II.B.4 since either is required to have obtained a Senior Reactor Operator's license.

Corrective steps which have been taken and the results achieved:

The below actions are sufficient to prevent recurrence.

Corrective steps which will be taken to avoid further violations:

The plant manager will be given the training in mitigation of core damage specified in Enclosure 3 to H. R. Denton's March 28, 1980 letter. This training will be completed by August 1, 1985. In addition, we will consider seeking either 1) a modification of the Technical Specifications or 2) the clarification of the July 10, 1981 Order to require training only for licensed operators in the operations chain from the Manager of Operations down.

Date when full compliance will be achieved: Full compliance will be achieved by August 1, 1985.

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
April 29, 1985
Page Six

Violation 3:

10 CFR 50 Appendix B Criterion V as implemented by the licensee's accepted QA program, Final Safety Analysis Report (FSAR) Section 17.2.5, requires that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures.

10 CFR 50 Appendix B Criterion XVII as implemented by the licensee's accepted QA program, FSAR Section 17.2.17, requires that the licensee shall establish requirements concerning record retention and that records shall be identifiable and retrievable.

Contrary to the above, as of February 7, 1985, procedures were not in place for the control or retention of training records.

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

Response To Violation 3:

Admission or denial of alleged violation: The violation occurred.

Reason for the violation: The improper control of retained training records was the result of an inadequate procedure. Procedure HNP-820, Plant Records Management, defines methods for the collection, storage, and maintenance of plant quality assurance records, but lacked specificity with respect to training records.

Corrective steps which have been taken and the results achieved:
The actions described below are sufficient to prevent recurrence.

Corrective steps which will be taken to avoid further violations:
Subject to the Plant Hatch Procedure Upgrade Program, Procedure HNP-820 is being revised and reformatted as a department instruction DI-TRN-10-0884. This instruction will include details for the control and retention of training records as reflected in the requirements of the American National Standards Institute (ANSI) N45.2.9.

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
April 29, 1985
Page Seven

Date when full compliance will be achieved: Full compliance will
be achieved on July 31, 1985.

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

Sincerely yours,

L. T. Gucwa

L. T. Gucwa

JJB/blm

ax: J. T. Beckham, Jr.
H. C. Nix, Jr.
Senior Resident Inspector