CUAR MEQUIAN	UNITED S NUCLEAR REGULATI REGIO 101 MARIETTA ATLANTA, GEO JAN	TATES DRY COMMISSION N II ITREET, N.W. RGIA 30323 8 1992	
Report Nos.: 5	0-321/92-33 and 50-366	/92-33	
Licensee: Geor P. C Birm	gia Power Company). Box 1295 ningham, AL 35201		
Docket Nos.: 5	0-321 and 50-366	License Nos.:	DPR-57 and NPF-5
Facility Name:	Hatch 1 and 2		
Inspection Cond	Jucted: December 7-11,	1992	
Inspector:	Jones Jones		1/7/93 Date Signed
Approved by: T. Rad Rad	R. Decker, Chief Niological Effluents and Niological Protection a	d Chemistry Section nd Emergency Prepar	Date Signed edness Branch

SUMMARY

Division of Radiation Safety and Safeguards

Scope:

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This routine, announced inspection was conducted in the areas of radioactive effluent monitoring instrumentation, control room emergency ventilation systems, meteorological monitoring, and radioactive waste management.

Results:

In the areas inspected, one violation was identified.

The licensee had effectively implemented a program for maintaining radioactive effluent monitoring instrumentation in an operable status and for calibrating those instruments (Paragraph 2).

The licensee had complied with the operational and surveillance requirements for the control room emergency ventilation systems (Paragraph 3).

The meteorological instrumentation was adequately maintained and the meteorological monitoring program had been effectively implemented (Paragraph 4).

The licensee disposed of sludge from the onsite sewage treatment facility by spreading the sludge on licensee-owned land outside of the protected area. In doing so, the licensee had not complied with the requirements in 10 CFR 20.301 and 10 CFR 20.302 for disposing of licensed material only in an authorized manner or in 10 CFR 20.201 for performing adequate surveys to assure that licensed material was not being disposed of in an unauthorized manner (Paragraph 5).

REPORT DETAILS

Persons Contacted

1.

Licensee Employees

*B. Arnold, Supervisor, Chemistry *D. Bennett, Superintendent, Chemistry *J. Betsill, Unit Superintendent, Operations *I. Buchans, Supervisor, Instrumentation and Control *D. Carter, Acting Manager, Plant Administration W. Conant, Foreman, Chemistry *S. Curtis, Support Superintendent, Operations B. Feimster, Specialist, Health Physics and Chemistry *P. Fornel, Manager, Maintenance *O. Fraser, Site Supervisor, SAER *D. Garvin, Specialist, SAER *G. Goode, Manager, Engineering Support *W. Kirkley, Manager, Health Physics and Chemistry *L. Lawrence, Specialist, SAER *J. Lew s. Manager, Operations M. Marionneaux, Foreman, Health Physics *V. McGowan, Supervisor, Chemistry *J. Payne, Senior Engineer, Nuclear Safety and Compliance *D. Read, Assistant General Manager, Plant Support J. Reddick, Supervisor, Health Physics *P. Roberts, Acting Manager, Outages and Planning *J. Thompson, Manager Nuclear Security *S Tipps, Manager, Nuclear Safety and Compliance *P. Wells, Unit Superintendent, Operations

D. Woodson, System Engineer, Engineering Support

Other licensee employees contacted included engineers, technicians, and administrative personnel.

Nuclear Regulatory Commission

*E. Christnot, Resident Inspector *L. Wert, Senior Resident Inspector *A. Wilford, Intern

*Attended exit interview

2.

Radioactive Effluent Monitoring Instrumentatior (84750)

Technical Specifications (TSs) 3/4.14.1 and 3/4.14.2 for Unit 1 and 3/4.3.6.9 and 3/4.3.6.10 for Unit 2 described the operational and surveillance requirements for the radioactive effluent monitoring instrumentation. The instrumentation was required to be operable during specified operational conditions and demonstrated to be operable by the performance of channel checks, source checks, channel calibrations, and channel functional tests at specified frequencies.

The inspector toured the main control room, the radwaste processing control rooms, and other relevant areas of the facility with a licensee representative to locate and determine the operational condition of the following effluent radiation monitors.

1D11-N007	Unit 1 Liqu	iid Radwaste	Effluent	Monitor
2D11-N007	Unit 2 Liqu	id Radwaste	Efiluent	Monitor
D11-K600 A & B	Main Stack	Monitors		

The instrumentation for the above radiation monitors was found to be operable at the time of the tour.

The inspector reviewed the procedures listed below which related to the performance and documentation of channel checks, source checks, channel calibrations, and channel functional tests for the above listed monitors.

34S0-G11-036-15	"Sample Tank Operating Procedure"		
3450-611-021-25	"Radwaste Sample Tank Operating Procedure"		
345V-SUV-019-15	"Surveillance Checks"		
345V-SUV-019-25	"Surveillance Checks"		
64CH-RPT-004-05	"Liquid Effluents: Reports"		
62CI-CAL-007-0S	"Off Gas Vent Pipe (Stack) Monitor and Posttreatment Monitor"		
62CI-CAL-009-05	"Liquid Radwaste Radiation Monitor"		
575V-D11-011-15	"Liquid Radwaste Effluent Radiation Monitor FT&C"		
57SV-D11-011-2S	"Liquid Radwaste Effluent Radiation Monitor FT&C"		
57SV-D11-010-1S	"Main Stack (Off-Gas Vent Pipe) Radiation Monitor Functional Test and Calibration"		

The inspector determined that the above procedures included provisions for performing the required surveillances in accordance with the relevant TSs. The inspector also reviewed selected licensee records of channel checks, source checks, channel calibrations, and channel functional tests for each of the above listed monitors. The records selected for review were generally the three most recent surveillances performed. Those records indicated that the surveillances had been performed in accordance with their applicable procedure and at the required frequency.

Based on the above reviews and observations, it was concluded that the licensee had effectively implemented a program for maintaining radioactive effluent monitoring instrumentation in an operable status and for calibrating those instruments.

No violations or deviations were identified.

Control Room Emergency Ventilation Systems (84750)

TSs 3/4.12 for Unit 1 and 3/4.7.2 for Unit 2 described the operational and surveillance requirements for the main control room environmental systems. Two independent systems consisting of fans, pre-filters, high efficiency particulate air (HEPA) filters, and charcoal adsorber filter beds were required to be operable during reactor startup, power operation, hot shutdown, and refueling operations. Action statements applicable to various modes were provided for conditions in which one or both of the systems were inoperable. The frequencies for functional testing, visual inspection, filter leak testing, air flow measurements, differential pressure measurements, and charcoal adsorption efficiency resting were specified.

The inspector toured the plant area in which the control room ventil in systems were located. The licensee's cognizant system enginee: located and identified, for the inspector, the major components of the systems. The inspector observed that the components and associated ductwork were well maintained structurally and that there was no physical deterioration of the ductwork sealants.

The inspector reviewed the procedures listed below and determined that they included provisions for performing the above operability and performance tests at the required frequencies. The acceptance criteria for the test results specified in those procedures were consistent with the TS requirements. Review of selected records of those tests indicated that they had been performed at the required frequencies and that the acceptance criteria had been met.

34SV-Z41-001-0S "Control Room Filter Train Operability"
42SV-Z41-002-0S "Testing of Control Room Habitability Filter
Trains"
42SV-Z41-003-0S "Control Room Filter Train Flow and DP
Measurement"

Based on the above reviews and observations , it was concluded that the licensee had complied with the above operational and surveillance requirements for the control room emergency ventilation systems.

No violations or deviations were identified.

4. Meteorological Monitoring Program (84750)

Section 2.3.3 of the Unit 2 Final Safety Analysis Report (FSAR) described the operational and surveillance commitments for the meteorological monitoring instrumentation. Those commitments included continuous recording of wind speed, wind direction, and vertical temperature differences and semiannual instrument calibration.

3.

The inspector reviewed procedure 64CH-ENV-001-0S "Meteorological Station" and determined that it included provisions for daily instrument operability checks and recording of meteorological data. The inspector also reviewed the records for performance of that procedure on November 28, 29, and 30, 1992, and determined that the specified surveillances had been performed on a daily basis. The licensee indicated that a computerized records system was used for collecting and reducing the continuously generated meteorological data and for producing an annual summary of the data for the year end Semiannual Effluent Release Report.

The inspector reviewed the selected reports for recent vendor performed calibrations of the meteorological instrumentation and determined that the calibrations had been performed semiannually as required.

Based on the above reviews, it was concluded that the meteorological instrumentation was adequately maintained and that the meteorological monitoring program had been effectively implemented.

No violations or deviations were identified.

5. Radioactive Waste Management (84750)

10 CFR 20.301 specifies that no licensee shall dispose of licensed material except: (a) by transfer to an authorized recipient as provided for in the applicable regulations contained in 10 CFR Parts 30, 40, 60, 61, 70, or 72; or (b) as authorized pursuant to 10 CFR 20.302 or 10 CFR Part 61; or (c) as provided in 10 CFR 20.303, applicable to the disposal of licensed material by release into sanitary sewerage systems, or in 10 CFR 20.306 for disposal of specific wastes, or in 10 CFR 20.106 for radioactivity in effluents to unrestricted areas.

10 CFR 20.302 specifies that any licensee may apply to the Commission for approval of proposed procedures to dispose of licensed material in a manner not otherwise authorized in the regulations in 10 CFR Chapter 1. Each application should include a description of the licensed material and any other radioactive material involved, including the quantities and kinds of such material and the levels of radioactivity involved, and proposed manner and conditions of disposal. The application should also include an analysis and evaluation of pertinent information as to the nature of the environment, including topographical, geological, meteorological, and hydrological characteristics; usage of ground and surface waters in the general area; the nature and location of other potentially affected facilities; and procedures to be observed to minimize the risk of unexpected or hazardous exposures.

10 CFR 20.201(b) requires each licensee to make or cause to be made such surveys as (1) may be necessary for the licensee to comply with the regulations in 10 CFR 20, and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. The licensee's activities with regard to characterizing and disposing of potentially contaminated waste oil and sewage sludge were discussed with the licensee during this inspection. The licensee provided the following information to the inspector.

a. Waste Oil

Each 55 gallon drum of potentially contaminated waste oil was sampled and initially analyzed by gamma-ray spectrometry in the on-site laboratory. The on-site measurement procedures had the capability of achieving the lower limits of detection (LLD) required for radioactive effluent measurements but could not achieve the LLDs required for radiological environmental measurements. If no radioactivity was detected in the oil sample by the onsite laboratory, the sample was sent to the licensee's offsite laboratory for analysis by procedures which could achieve the LLDs required for environmental measurements. If no activity above background was detected by the more sensitive measurement, then the waste oil was transferred to a used oil reclamation center. If activity was detected in the sample by either the onsite or the offsite measurements, then the oil was shipped as radioactive material to a vender for incineration.

b. Sewage Sludge

The licensee disposed of sludge from the onsite sewage treatment facility by spreading the sludge on licensee-owned land outside of the protected area. The sludge was accumulated in storage tanks located in the sewage treatment facility. When the tanks became full they were sampled and the samples were analyzed by gamma-ray spectrometry in the onsite laboratory. As with the waste oil, the onsite measurement procedures had the capability of achieving the LLD required for radioactive effluent measurements but could not achieve the LLDs required for radiological environmental measurements. If no activity above background was detected in the sample the sludge was pumped from the storage tanks into a tank truck. The tank truck was used to transport the sludge to an area beneath the power transmission lines and to spread the sludge on the ground. This method of disposal had been a routine practice until May 1992. At that time the practice was discontinued pending licensee management review of the practice and a decision as to whether the practice was specifically authorized by the National Pollutant Discharge Elimination System (NPDES) permit issued by the Georgia Department of Natural Resources for the plant wastewater treatment facility (NPDES Permit No. GA 0004120).

10 CFR 20.302 provides a method for obtaining approval of proposed procedures for disposing of radioactive material in a manner not otherwise authorized in the regulations. In Agreement States, such as Georgia, applications to obtain approval for such disposals should be submitted to the Agreement State rather than to the NRC. The inspector reviewed the NPDES permit which expired on December 1, 1991, and the permit for the period December 1, 1991, through October 31, 1997. Both permits addressed disposal of sludge from the sewage treatment plant but neither addressed measurement for or content of radioactive material in the sludge.

In that the sludge was not measured for radioactive material content by procedures which had the capability of achieving the LLDs required for environmental measurements, the release surveys performed on the sludge were inadequate for assuring that licensed material was not being disposed of in a manner not authorized in NRC regulations. If the sludge samples had been measured by procedures capable of achieving environmental level LLDs and no activity above background had been detected, then the sludge could have been disposed of as non-radioactive material and the provisions of 10 CFR 20.301 and 10 CFR 20.302 would not have been applicable.

Based on the above information it was concluded that the licensee had not complied with the requirements in 10 CFR 20.301 and 10 CFR 20.302 for disposing of licensed material only in an authorized manner or in 10 CFR 20.201 for performing adequate surveys to assure that licensed material was not being disposed of in an unauthorized manner. This issue has been deemed to be a violation (50-321/92-33-01, 50-366/92-33-01).

One violation was identified in this area.

6. Exit Interview

The inspection scope and results were summarized on December 11, 1992, with those persons indicated in Paragraph 1. The inspector described the areas inspected and discussed in detail the inspection results listed above. Further discussions concerning the inspection results were held with the licensee during a telephone conversation on December 22, 1992. No dissenting comments were received from the licensee. Proprietary information is not contained in this report.