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December 19, 1996



Docket Nos. 50-321
50-366

HL-5288

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

Edwin I. Hatch Nuclear Plant
Reply to a Notice of Violation

Gentlemen:

In response to your letter dated November 22, 1996, and according to the requirements of 10 CFR 2.201, Georgia Power Company (GPC) is providing the enclosed responses to the Notices of Violation associated with Inspection Report 96-12. In each enclosure, a transcription of the NRC violation precedes GPC's response.

Georgia Power Company would like to take this opportunity to respond to negative comments contained in your cover letter. The first of these is a statement which reads, "your implementation of the Maintenance Rule did not demonstrate good integration of other maintenance programs with Maintenance Rule requirements." We respectfully submit that this comment is not supported by examples or other comments in the Inspection Report.

Also, in your cover letter you concluded that lack of documented findings in GPC internal Maintenance Rule audits and failure to address some issues in the deficiency control system "put into question the threshold for formal identification of deficiencies and the effectiveness of your corrective action program." Under the GPC QA audit procedures, a finding is issued when a noncompliance to the QA program is identified which requires corrective action. The review of the Maintenance Rule audit notes by the NRC inspector included the GPC auditors' observations which may have provided enhancements to GPC's Maintenance Rule program, but did not result in noncompliance with NRC rules or with GPC procedures. It is the opinion of GPC that the comments in the cover letter are subjective and do not reflect a potential weakness in the corrective action program. The comment regarding items not included in the deficiency control system is an isolated incident and is addressed in the enclosed violation response. The most recent SALP and IPAP reports concluded that GPC audits were of good quality and that there was a low threshold for identifying problems in the deficiency control program (typically, 300 to 800 deficiencies are generated per month).

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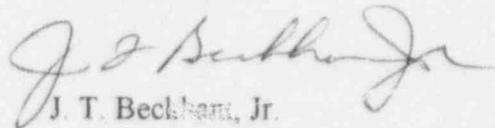
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U. S. Nuclear Regulatory Commission
December 19, 1996

Page 2

In summary, Georgia Power Company has and is committed to maintaining an effective corrective action program and will continue to build on past good performance in this area.

Sincerely,


J. T. Beckham, Jr.

JAW/eb

Enclosures:

1. Violation 96-12-01 and GPC Response
2. Violation 96-12-02 and GPC Response
3. Violation 96-12-03 and GPC Response

cc: Georgia Power Company

Mr. H. L. Sumner, Jr., Nuclear Plant General Manager
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. Ebnetter, Regional Administrator

Mr. B. L. Holbrook, Senior Resident Inspector - Hatch

Enclosure 1

Edwin I. Hatch Nuclear Plant
Violation 96-12-01 and GPC Response

VIOLATION 96-12-01

10 CFR 50.65 (b) establishes the scoping criteria for selection of safety related and non-safety related structures, systems, or components to be included within the Maintenance Rule program. Scoping criteria shall include, in part, non-safety related structures, systems, or components that are relied upon to mitigate accidents or transients, or are used in the plant emergency operating procedures, or whose failure could prevent safety-related structures, systems, and components from fulfilling their safety-related function, or whose failure could cause a reactor scram or actuation of a safety-related system.

Hatch Nuclear Plant Administrative Procedure, 40AC-ENG-020-0S, Maintenance Rule (10 CFR 50.65) Implementation and Compliance, Revision 1, and the Hatch Nuclear Plant 10 CFR 50.65 Maintenance Rule Scoping Manual, Revision 1, implemented the requirements of 10 CFR 50.65 and identified those systems and components included within the scope of the Maintenance Rule.

Contrary to the above,

As of October 25, 1996, the licensee failed to include a number of nonsafety-related systems or components within the scope of the Maintenance Rule as required. Specifically, the following systems should have been included within the scope of the Maintenance Rule, but were not.

1. Communications System, Emergency Lighting System, and Appendix R Emergency Lighting System - These non-safety related systems were not included in the scope of the Maintenance Rule even though they are relied upon to mitigate accidents or transients.
2. Cooling Tower System - This non-safety related system was not included in the scope of the Maintenance Rule even though the system experienced a failure on March 24, 1995, which could have caused a Unit 2 reactor scram and actuation of a safety-related system; and experienced a similar failure on September 1, 1995, which resulted in a Unit 2 reactor scram and actuation of a safety-related system.

This is a Severity Level IV violation (Supplement 1)

RESPONSE TO VIOLATION 96-12-01

Georgia Power Company respectfully denies this violation. The communications, emergency lighting, Appendix R emergency lighting, and cooling tower systems do not meet the scoping criteria of 10 CFR 50.65(b). Therefore, they are not required to be included in the Hatch Maintenance Rule program and their exclusion does not represent a violation of the requirements of 10 CFR 50.65 or administrative control procedure, 40AC-ENG-020-0S, "Maintenance Rule (10 CFR 50.65) Implementation and Compliance."

Contrary to that stated in item 1 of the Notice of Violation, neither the communications system, the emergency lighting system, nor the Appendix R emergency lighting system is relied upon to mitigate any accident or transient described in the Hatch Unit 1 or Unit 2 Updated Final Safety Analysis Reports. The statement that these systems are "relied upon to mitigate accidents or transients" is an opinion not supported by any documented accident or transient analysis in the Updated Final Safety Analysis Reports. Furthermore, the more specific scoping guidance provided in NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Revision 0, would not lead to the conclusion any of these systems is within the scope of the Maintenance Rule. NUMARC 93-01, Revision 0, has been endorsed in its entirety by the NRC in Regulatory Guide 1.160.

Per section 8.2.1.2 of NUMARC 93-01, Revision 0, only non-safety related structures, systems, or components that are relied upon to mitigate accidents or transients are required to be included within the scope of the Maintenance Rule. A review of Chapter 14, "Plant Safety Analysis," of the Unit 1 Updated Final Safety Analysis Report and Chapter 15, "Accident Analysis," of the Unit 2 Updated Final Safety Analysis Report reveals that neither the communications system, the emergency lighting system, nor the Appendix R emergency lighting system performs either an active or a passive function in mitigating any analyzed accident or transient. Moreover, none of these systems performs a support role for any structure, system, or component which is used to mitigate analyzed accidents and transients.

Operation of these systems is not vital to the successful completion of actions required by the Emergency Operations Procedures or other procedures which might be used in responding to an accident or a transient. Per section 8.2.1.3 of NUMARC 93-01, Revision 0, a non-safety related structure, system, or component should be included in the scope of the Maintenance Rule if it adds "significant value to the mitigation function of an EOP by providing the total or a significant fraction of the total functional ability required to mitigate core damage or radioactive release." These three systems do not meet this definition. Their failure, either singularly or in combination, will not prevent the successful completion of the actions required by the Emergency Operations Procedures and other abnormal operating procedures. That is, their proper operation does not provide a significant portion of the "total functional ability" required to complete actions directed by

Enclosure 1
Violation 96-12-01 and GPC Response

the aforementioned procedures. Failures of the communication and/or emergency lighting systems can be overcome easily without a significant adverse affect on the operators' ability to complete required procedure actions. The scoping guidance provided in the NRC-endorsed NUMARC 93-01, Revision 0, would not lead to the conclusion that the communications, emergency lighting, and the Appendix R emergency lighting systems are within the scope of the Maintenance Rule.

It should be noted the communication system is a highly reliable system by virtue of the fact it can be powered by either one of two redundant, Class 1E power supplies. The Class 1E power supplies are included in the Hatch Maintenance Rule program. Additionally, the emergency lighting and the Appendix R emergency lighting systems are tested periodically using plant procedures 52IT-MEL-001-0N, "Emergency Lighting Inspection and Test," and 42SV-FPX-003-0S, "Emergency Lighting Surveillance," respectively. The latter test is required by Appendix B of the Hatch Fire Hazards Analysis. The testing performed using these two procedures provides reasonable assurance the emergency lighting systems will function properly.

The failure of the cooling tower system can not directly cause a reactor scram or actuation of a safety-related system. Neither of the events listed in item 2 of the Notice of Violation directly caused a reactor scram or an actuation of a safety-related system. The 3/24/95 event resulted in a power reduction only; no reactor protection or other safety-related system actuations occurred. The 9/1/95 event eventually resulted in the insertion of a manual scram; however, this action was necessary only because inadequate procedure instructions prevented the proper venting of a main condenser waterbox. With one of the waterboxes air-bound, vacuum could not be maintained and a manual scram was inserted as a conservative action. Had the procedure provided proper instructions for venting the waterbox, vacuum could have been maintained and no manual scram would have been necessary. Problems in the main condenser and circulating water systems more directly led to the decrease in vacuum and the subsequent manual scram; these two systems are in the Hatch Maintenance Rule Program. The failure of the cooling tower system did not result in a reactor scram. Therefore, the system does not meet the criteria listed in 10 CFR 50.65(b)(2)(iii) and it is not required to be included in the scope of the Maintenance Rule. The scoping guidance provided in the NRC-endorsed NUMARC 93-01, Revision 0, would not lead to the conclusion that the cooling tower system is within the scope of the Maintenance Rule.

Georgia Power Company believes it has correctly implemented the requirements of 10 CFR 50.65, by using the NEI (NUMARC) guidance, endorsed by the NRC. GPC has concluded that NUMARC 93-01 does not require that communications, emergency lighting, Appendix R emergency lighting, and cooling tower systems be included in the Maintenance Rule scope for Plant Hatch. Therefore, Georgia Power Company respectfully denies this violation. If the NRC requires that these systems be included, then this issue should be resolved with NEI.

Enclosure 2

Edwin I. Hatch Nuclear Plant
Violation 96-12-02 and GPC Response

VIOLATION 96-12-02

10 CFR 50.65 (a)(1) requires, in part, that each holder of an operating license shall monitor the performance or condition of structures, systems, or components against licensee established goals. Such goals shall be established commensurate with safety.

Contrary to the above,

As of October 25, 1996, the licensee failed to establish reliability and/or availability goals or performance criteria commensurate with safety for risk significant structures, systems or components for the following systems:

- Primary Containment System
- Feed and Condensate System
- Circulating Water System
- Electro-hydraulic Control System
- Unit 2 Containment Chilled Water System
- AC Electrical System
- DC Electrical System
- Primary Containment Isolation System
- Analog Transmitter Trip System

For these systems the licensee either failed to establish performance criteria, or established performance criteria that would not satisfactorily monitor system performance.

This is a Severity Level IV violation (Supplement 1)

RESPONSE TO VIOLATION 96-12-02

Reason for the violation:

Georgia Power Company admits that additional performance criteria could have been established for the primary containment and primary containment isolation, feedwater and condensate, circulating water, electrohydraulic control, and primary containment chilled water systems. These errors were a result of either a misinterpretation of the allowance for taking credit for existing programs, such as 10 CFR 50, Appendix J, or a belief that

Enclosure 2
Violation 96-12-02 and GPC Response

systems relied on for plant operation could be used in specific cases to assure adequate availability.

Georgia Power Company, however, respectfully denies performance criteria for the AC and DC electrical and analog transmitter trip systems were not properly established. These systems have reliability criteria established in the Hatch Maintenance Rule Program. Availability criteria for these systems are adequately established by the Hatch Unit 1 and Unit 2 Technical Specifications as very limited out-of-service times. For example, Unit 1 Technical Specification Limiting Condition for Operation 3.8.4, Action C, allows one station service DC electrical power subsystem to be inoperable for only two hours before the plant must begin to shut down. Similarly restrictive requirements exist for inoperable components in the AC electrical system. Inoperable components in the analog transmitter trip system may be required by the applicable Technical Specification to be placed in the tripped condition in as little as six hours. Realistically, these limited out-of-service times require the systems to be available virtually 100 percent of the time. In effect, the existing plant Technical Specifications establish very stringent availability criteria and no additional availability criteria are necessary. The effectiveness of maintenance on these systems is readily apparent because the short out-of-service times allowed by the Technical Specifications would quickly result in adverse effects on continued unit operation. Additional availability criteria would serve no useful purpose and are not necessary to comply with the requirements of 10 CFR 50.65(a)(1). Therefore, Georgia Power Company respectfully denies these three examples constitute a violation of NRC requirements.

The existing NEI (NUMARC 93-01) and NRC (R.G. 1.160) guidance documents do not address availability of systems which are required to be virtually 100% available by the plant Technical Specifications. GPC believes that including additional performance criteria for these three systems in the Maintenance Rule program will serve no useful purpose. A draft revision to NUMARC 93-01 guidance document has been developed by NEI. The NRC has drafted endorsement to this revision with a draft revision to R. G. 1.160. We believe that these documents further support GPC's position on these three systems.

Corrective steps which have been taken and the results achieved:

Engineering Support personnel are in the process of evaluating appropriate additional performance criteria for the primary containment, feedwater and condensate, circulating water, electrohydraulic control, Unit 2 containment chilled water, and primary containment isolation systems.

Enclosure 2
Violation 96-12-02 and GPC Response

Corrective steps which will be taken to avoid further violations:

The proposed criteria will be presented to the Hatch Maintenance Rule Expert Panel for review and approval per the requirements of administrative control procedure, 40AC-ENG-020-0S. Approved criteria will be implemented by 2/15/97.

Date when full compliance will be achieved:

Full compliance will be achieved by 2/15/97 when appropriate performance criteria are approved and implemented.

Enclosure 3

Edwin I. Hatch Nuclear Plant
Violation 96-12-03 and GPC Response

VIOLATION 96-12-03

10 CFR 50.65 (a)(1) requires, in part, that holders of an operating license shall monitor the performance or condition of structures, systems, or components, against licensee-established goals, in a manner sufficient to provide reasonable assurance that such structures, systems, and components, within the scope of the Maintenance Rule, are capable of fulfilling their intended functions. When the performance or condition of a structure, system, or component does not meet established goals, appropriate corrective action shall be taken. 10 CFR 50.65 (a)(2) requires, in part, that monitoring as specified in paragraph (a)(1) is not required where it has been demonstrated that the performance or condition of a structure, system, or component is being effectively controlled through the performance of appropriate preventative maintenance, such that the structure, system, or component remains capable of performing its intended function.

Hatch Nuclear Plant Administrative Control Procedure, 40AC-ENG-020-0S, Maintenance Rule (10 CFR 50.65) Implementation and Compliance, Revision 1, established procedures for implementation of the requirements of 10 CFR 50.65 (a)(1) and (a)(2)

40AC-ENG-020-0S, paragraph 8.6.3 requires, in part, the system engineer to perform a cause determination, evaluate generic common cause implications, include events impact on performance criteria, document the event using the deficiency process, and implement additional monitoring, surveillance or preventative maintenance tasks, as required, when an event occurs which impacts system/function performance criteria. Paragraph 8.7.1 requires, in part, establishment of goals when performance criteria is (sic) not meant or a repetitive maintenance preventable functional failure occurs.

Contrary to the above,

Between July 10 and October 2, 1996, the licensee failed to follow the requirements of 40AC-ENG-020-0S, paragraph 8.6.3 and 8.7.1, for three maintenance preventable functional failures which occurred on the Unit 1 Traveling Screen/Trash Rake System during the period October 1995 - January 1996, resulting in failure to implement the requirements of 10 CFR 50.65 (a)(1) and (a)(2) of the Maintenance Rule.

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

RESPONSE TO VIOLATION 96-12-03

Reason for the violation:

This violation was the result of personnel error. The person examining the data on the traveling screen/trash rake system failed to recognize that three failures of the Unit 1 traveling water screens during the period from October 1995 to January 1996 constituted maintenance preventable functional failures per administrative control procedure 40AC-ENG-020-0S and 10 CFR 50.65. This error was recognized by plant personnel in October 1996 during investigation of another failure of this system and appropriate actions taken for the previous failures at that time. Actions for the previous maintenance preventable functional failures, such as additional monitoring, additional surveillances, or added preventive maintenance tasks, were not taken at the time of the failures as required by procedure 40AC-ENG-020-0S.

Corrective steps which have been taken and the results achieved:

Appropriate goals and monitoring have been established for this system.

Corrective actions for these failures have been identified as required by the rule; they are based upon a root cause analysis performed by the system engineer and approved by plant management on 11/1/96. Resultant followup actions are in progress on this system as a result of the corrective action identification.

The person responsible for the error is no longer employed by Georgia Power Company.

Corrective steps which will be taken to avoid further violations:

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

Date when full compliance will be achieved:

Georgia Power Company presently is in full compliance with the requirements of 10 CFR 50.65 (a)(1) and administrative control procedure 40AC-ENG-020-0S regarding actions required to be taken for maintenance preventable functional failures on the Unit 1 traveling screen/trash rake system.