UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

Report Nos.: 50-321/85-19 and 50-366/85-19

Licensee: Georgia Power Company
P. O. Box 4545
Atlanta, GA 30302

Docket Nos.: 50-321 and 50-366 License Nos.: DPR-57 and NPF-5

Facility Name: E. I. Hatch

Inspection Conducted: June 10 - 14, 1985

Inspectors: P. D. Wagner 6/28/85
P. D. Wagner Date Signed

P. D. Wagner for 6/28/85
W. K. Poertner Date Signed

Approved by: 7/1/85
B. T. Debs, Section Chief (Acting) Date Signed
Division of Reactor Safety

SUMMARY

Scope: This routine, unannounced inspection entailed 57 inspector-hours on site in the areas of corrective maintenance, preventive maintenance, housekeeping and information notice tracking.

Results: No violations or deviations were identified.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

*H. Nix, Plant Manager
*T. Seitz, Manager, Maintenance
*C. Stancil, Regulatory Compliance Engineer
*P. Fornel, QA Site Manager
*S. Tipps, Superintendent, Regulatory Compliance
*L. Byrnes, QA Engineer
*C. Jones, Manager, Engineering
J. Dawson, Planning and Scheduling Supervisor
R. Glisson, Engineering Supervisor
J. Large, Superintendent, Maintenance Operations
G. Barker, Controls and Instrumentation Supervisor
J. Newton, Maintenance Supervisor
T. Elton, Regulatory Compliance

Other licensee employees contacted included engineers, technicians, operators, mechanics and office personnel.

NRC Resident Inspector

*P. Holmes-Ray

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on June 13, 1985, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings listed below. No dissenting comments were received from the licensee.

Inspector Followup Item 321, 366/85-19-01, MWO Procedure Improvement, paragraph 5.

Inspector Followup Item, 321, 366/85-19-02, Preventive Maintenance Program Procedure, paragraph 5.

The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspectors during this inspection.

3. Licensee Action on Previous Enforcement Matters

(Closed) Violation 321, 366/82-10-02: Incorrect Welding or "Hot Work" Permit.

The licensee's new procedure, 40-AC-FPX01-0, Sections 8.1.4.5 and 8.1.4.6, clearly states the requirements for the duration of "Hot Work" permits. Also, the combustible material which was the subject of the violation was removed and stored in an acceptable area. The material which remained was covered under an approved permit as required by Section F of HNP-559. An information letter from plant management to supervisory personnel regarding Section F of HNP-559 was also issued on April 30, 1982.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Maintenance Program (62702)

References:

(a) 50AC-MNT01-0: Maintenance Program, Revision 1

(b) HNP-501: Equipment Clearance and Tagging, Revision 16

(c) 51GM-CAL01-0: Control of Test Shop Instrumentation, Revision 0

(d) 50AC-MNT02-0: Control of Measuring and Test Equipment, Revision 1

(e) 51GM-CAL02-0: Maintenance Shop Measuring and Test Equipment Control, Revision 0

(f) HNP-835: Audit Findings, Responses and Notifications, Revision 11

(g) HNP-823: Qualification of Inspection Personnel, Revision 10

(h) HNP-6914: Welder Performance Qualification, Revision 7

(i) 45QC-QCX02-0: Quality Control Inspection Plans, Revision 0

(j) 40AC-QCX01-0: Quality Control Inspection Program, Revision 0

(k) 10AC-MGR04-0: Deficiency Control System, Revision 0

(l) HNP-9: Procedure Writing, Use and Control, Revision 26

(m) HNP-504: Lifted Wire and Temporary Jumper Control, Revision 13

(n) HNP-22: Selection of Maintenance Employees, Revision 4

(o) HNP-813: Drawing Control, Revision 17

(p) 30AC-OPS02-0: Plant Housekeeping and Cleanness Control, Revision 0

The inspectors conducted a review of the above references to ascertain that the licensee has implemented a maintenance program that is in conformance with Technical Specifications, regulatory requirements, commitments, and industry guides or standards. The inspectors also reviewed selected Maintenance Work Orders (MWO), preventive maintenance procedures, conducted interviews with various maintenance personnel, observed selected MWOs in progress, and conducted tours of the plant to evaluate housekeeping practices.

The following aspects of the maintenance program were verified:

- Written procedures were established for initiating requests for routine and emergency maintenance.

- Criteria and responsibilities for development, review and approval of maintenance requests were established.

- Criteria and responsibilities that form the basis for designating the activity as safety or non-safety-related were established.

- Criteria and responsibilities were designated for performing work inspection of maintenance activities.

- Administrative controls for special processes were established.

- Methods and responsibilities for equipment control were clearly defined and established.

- Written procedures were established and responsibilities designated for cleanliness control of safety-related components and systems.

- Administrative controls and responsibilities for general housekeeping were established.

The licensee's overall maintenance program is undergoing revision. Procedures are being revised and upgraded, an improved preventive maintenance program is being developed, a predictive maintenance program is partially in place, improvements in MWO documentation and processing have begun, a computerized tracking system for MWOs has been implemented, a Work Planning Group (WPG) is functioning to improve job planning and documentation, a materials improvement plan has been started, and maintenance facilities have been upgraded. The changes currently in progress, or being planned for the future, are described in general terms in Plant E. I. Hatch Maintenance Improvement Plan.

Selected portions of this improvement plan were verified by the inspectors and are discussed throughout this report.

a. Corrective Maintenance

The WPG is comprised of representatives from the Maintenance Department, Operations Department, Engineering Department, the Quality Control Section, and the Health Physics and Chemistry Department. This planning group has been active since January 1984 and is responsible for planning and scheduling maintenance, generating work order packages, maintaining maintenance history, keeping track of maintenance currently being done, and ensuring functional tests are identified and reviewed. The WPG currently schedules work on a weekly basis. Schedules are normally distributed to responsible supervisors on the Friday preceding the scheduled week's work. All work is now tracked through a computerized system known as the Nuclear Plant Management Information System (NPMIS). All information contained on an MWO is entered into this system. Preventive maintenance MWOs are written by the WPG, but are scheduled by Regulatory Compliance. Interviews with the WPG Supervisor indicated that the WPG will soon assume the function of scheduling preventive maintenance through the NPMIS.

As of June 7, 1985, the licensee had a backlog of 1445 MWOs for Unit 1 and 837 MWOs for Unit 2. The WPG Supervisor stated that this backlog will be reduced significantly during the upcoming Unit 1 outage. He also stated that since the WPG has been functioning, the number of MWOs has decreased significantly from the initial 5000 MWOs that were backlogged. Of the current backlog in MWOs, only two MWOs were for preventive maintenance. At the time of this inspection, five surveillances were late. Most of these surveillances were late due to high radiation area inaccessibility.

The inspectors reviewed a selected number of safety-related work packages. Numerous examples were noted in which work instructions were not complete, procedures were not referenced, actual work performed was not adequately documented, and/or the cause of the failure was not indicated when applicable. The licensee had previously identified this problem and has taken several corrective measures. A departmental directive from the Manager, Maintenance, issued on April 26, 1985, clearly specified what information was expected to be documented on an MWO. The Work Planning Group also was tasked to conduct MWO training with applicable personnel to insure all personnel were aware of the need to accurately document maintenance. This training was still being conducted at the time of this inspection. The licensee's procedure describing the information to be included on an MWO is 50 AC-MNT01-0, Maintenance Program. This procedure, however, does not specify all the information which plant management wants to be included on an MWO. For example, the procedure does not specify that applicable safety instructions and maintenance housekeeping requirements will be included in the work instructions (Block 23 of the MWO). The procedure also does not specify that the procedures or manuals used to perform the work will be listed as part of the actual work performed section (Block 27 of the MWO). The licensee management stated that consideration would be given towards making the MWO procedure more

specific and that their consideration would be documented. This will be tracked as an inspector followup item (321, 366/85-19-01).

While reviewing the clearance index for both Units 1 and 2, the inspector observed that there were no entries made to signify performance of the monthly clearance audits for March and April 1985 (Unit 2), and March 1985 (Unit 1). Upon further investigation, the inspector learned that the required audits had been performed as a monthly surveillance item. The inspector informed licensee management that HNP-501, Equipment Clearance and Tagging, still requires that monthly audits be documented in the clearance index log.

Within this area, no violations or deviations were identified.

b. Preventive Maintenance and Predictive Maintenance

The inspector conducted a review of the licensee's implemented preventive maintenance program (PM). The licensee is presently in a PM procedure upgrade program. This program consists of reviewing all systems safety-related or important to operation and determining what the PM requirements are for each component in the system and then incorporating these requirements into the PM procedures. The licensee is in the process of completing the system reviews, but could not provide the inspector with an expected completion date for the PM upgrade program.

PMs are presently scheduled using the same computer based system that schedules and tracks surveillances. As stated before, Regulatory Compliance is presently tasked with generating and tracking the PM schedule. The licensee plans, however, to incorporate PMs into the Work Planning Group's functions. Presently, Regulatory Compliance generates a computer list that states what PMs are due to be performed. This list is then sent to the Work Planning Group which schedules the performance of the PM. The licensee plans to make the WPG responsible for scheduling and tracking PMs. This will be accomplished using the WPG's computer system.

The licensee is currently instituting a program of predictive maintenance. This program consists of vibration analysis for pumps and turbines, oil analysis and infrared analysis. This data will be used to trend the performance of each applicable component and is intended to reduce premature equipment failure and minimize unscheduled downtime. Presently, the vibration analysis program has been established and the equipment for oil analysis and infrared analysis is onsite.

The inspector expressed the following concern in this area:

The licensee presently has no administrative procedure that defines or implements the preventive maintenance or predictive maintenance programs. Preventive maintenance procedures are scheduled, but no

guidelines are established to determine what actions are required if a PM is not performed within the required time period.

The licensee is presently writing a procedure to define and interrelate the preventive and predictive maintenance programs. This procedure is expected to be issued by the end of July 1985. Until complete, this will be identified as an inspector followup item (321, 366/85-19-02).

Within this area, no violations or deviations were identified.

c. Plant Tours

The inspectors conducted tours of all accessible areas in both Units 1 and 2. The purpose of the tours was to assess the licensee's housekeeping practices and to observe maintenance in progress. The cleanliness of both units appeared satisfactory. Unit 2 was in excellent condition having recently completed a long outage period. Some graffiti was observed in the Reactor Building of both units. During one tour, the inspectors observed the performance of HNP 2-6310, Monthly Check of the Accumulator Precharge for Standby Liquid Control (SBLC), and the monthly cleaning of pentaborate crystals from SBLC pump seals, packing and pistons. The inspectors also observed corrective maintenance on the Containment Atmosphere Dilution nitrogen flowmeter for Unit 2. For all maintenance activities observed, no discrepancies were noted.

d. I&E Notices

The inspector reviewed the disposition of seven I&E Information Notices at Hatch. The Regulatory Compliance group is responsible for determining which plant group should receive the information and for establishing a file for each I&E Notice. The Notices are then distributed by Regulatory Compliance with a due date for response. The due dates are then tracked using a computer system. For the seven I&E Notices reviewed, the licensee responses appeared adequate and to have been completed in a timely manner.