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Georgia Power  
the southern electric system

SL-4303  
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March 16, 1988

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

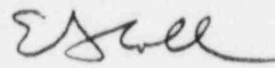
PLANT HATCH - UNITS 1, 2  
NRC DOCKETS 50-321, 50-366  
OPERATING LICENSES DPR-57, NPF-5  
RESPONSE TO INSPECTION REPORT 86-35

Gentlemen:

In accordance with the provisions of 10 CFR 2.201, Georgia Power Company (GPC) is providing the enclosed response to your February 25, 1988 letter. This letter transmitted the Notice of Violation associated with the inspection conducted on November 3 to November 7, 1986 at Plant Hatch. A copy of this response is being provided to NRC Region II for review. In the enclosures, a transcription of the NRC violation precedes GPC's response.

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

Sincerely,

  
for L. T. Gucwa

LGB/lc

Enclosures:

1. Transcription of NRC Violation 50-321/86-35-02 and 86-35-03 and 50-366/86-35-03 and 86-35-04 (Violation "A") and GPC Response
2. Transcription of NRC Violation 50-321/86-35-01 and 86-35-04, and 50-366/86-35-02 and 86-35-05 (Violation "B") and GPC Response

c: (see next page)

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c: Georgia Power Company  
Mr. J. T. Beckham, Jr., Vice President - Plant Hatch  
GO-NORMS

U. S. Nuclear Regulatory Commission, Washington, D. C.  
Mr. L. P. Crocker, Licensing Project Manager - Hatch

U. S. Nuclear Regulatory Commission, Region II  
Dr. J. N. Grace, Regional Administrator  
Mr. P. Holmes-Ray, Senior Resident Inspector - Hatch

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ENCLOSURE 1

PLANT HATCH - UNITS 1, 2  
NRC DOCKETS 50-321, 50-366  
OPERATING LICENSES DPR-57, NPF-5  
TRANSCRIPTION OF NRC VIOLATION 50-321/86-35-02 AND 86-35-03,  
AND 50-366/86-35-03 and 86-35-04 (VIOLATION "A") AND GPC RESPONSE

TRANSCRIPTION OF VIOLATION "A"

10 CFR 50.49 paragraphs (f) and (k) respectively require in part that: (1) each item of electrical equipment important to safety must be qualified to this part via methodologies delineated or; (2) applicants for and holders of operating licenses are not required to requalify electrical equipment important to safety in accordance with the provisions of this section if the Commission has previously required qualification of that equipment in accordance with "Guideline for Evaluating Environmental Qualification of Class 1E Electrical Equipment in Operating Reactors", November 1979 (DOR Guidelines). Additionally, the DOR guidelines, section 5.2.5, required that instrument accuracy requirements based on the maximum error assumed in the plant analysis should be included in the failure criteria.

Contrary to the above, at the time of the inspection and as far back as November 30, 1985:

1. EQ file QDP-26 did not adequately document qualification of Rosemount 1153 B transmitters to the DOR guidelines, in that the transmitter accuracy calculation and comparison with plant requirements did not include an analysis of the error contributed by terminal blocks located in a harsh environment.
2. EQ file QDP-4 did not adequately document qualification of states terminal blocks (ZWM and NT) to the DOR guidelines in that a comparison of the errors determined during type testing with plant application performance criteria was never performed for resistance temperature detector (RTD) circuits.

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

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ENCLOSURE 1 (Continued)

TRANSCRIPTION OF NRC VIOLATION 50-321/86-35-02 AND 86-35-03,  
AND 50-366/86-35-03 and 86-35-04 (VIOLATION "A") AND GPC RESPONSE

RESPONSE TO VIOLATION "A"

Admission or denial of violation:

The violation occurred as cited in the Notice of Violation. However, Georgia Power Company (GPC) requests that the violation be downgraded from a Severity Level IV violation to a Severity Level V violation.

GPC bases this request on the guidance provided in 10 CFR Part 2, Appendix C, Section III (Severity of Violations) and and 10 CFR Part 2, Appendix C, Supplement I, Subsection D (Severity IV) and Subsection E (Severity Level V).

These sections state that Severity Level IV (SL-IV) violations are less serious (than Severity Level III violation) but are of more than minor concern; i.e., if left uncorrected, they could lead to a more serious concern. This statement is a pivotal one in our justification for the lower severity level because Severity Level V (SL-V) violations are of minor safety or environmental concern. This particular violation could not have led to a more serious concern.

Additionally, the guidance provided in Supplement I, Subsections D and E provide guidelines for the assignment of the severity classification for a violation. Severity Level IV violations are normally assessed for the following reasons:

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ENCLOSURE 1 (Continued)

TRANSCRIPTION OF NRC VIOLATION 50-321/86-35-02 AND 86-35-03,  
AND 50-366/86-35-03 and 86-35-04 (VIOLATION "A") AND GPC RESPONSE

1. A less significant violation of a Technical Specification Limiting Condition for Operation where the appropriate Action Statement was not satisfied within the time allotted by the Action Statement.
2. Failure to meet the requirements of 10 CFR 50.59 that does not result in a Severity Level I, II, or III violation.
3. Failure to meet regulatory requirements that have more than minor safety or environmental significance.
4. Failure to make a required Licensee Event Report.

Severity Level V violations are normally assessed only for violations that have minor safety or environmental significance.

GPC believes this violation does not satisfy the criteria for a SL-IV violation but clearly satisfies the criterion of a SL-V violation. The cited violation concerns documentation deficiencies that have a minor adverse impact. The justifications for this statement (any errors were shown to be acceptable, leakage currents were insignificant, no measurable error shown in circuits) were provided to representatives of the NRC in an enforcement conference that was held in Region II Headquarters on 1/13/88. If the conditions detailed in the Notice of Violation were left uncorrected, these discrepancies would not lead to a serious safety concern. This conclusion is based on tests and analyses and, as discussed in the enforcement conference, were found to be of limited safety significance.

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ENCLOSURE 1 (Continued)

TRANSCRIPTION OF NRC VIOLATION 50-321/86-35-02 AND 86-35-03,  
AND 50-366/86-35-03 and 86-35-04 (VIOLATION "A") AND GPC RESPONSE

Reason for the violation:

The violation was the result of personnel error on the part of employees of Plant Hatch's Architect/Engineering firm. It was incorrectly assumed by the Architect/Engineer, during the original qualification analysis, that leakage currents were insignificant and, therefore, did not have to be quantified and documented.

Corrective steps which have been taken and the results achieved:

As a result of this event, the following corrective actions were implemented:

1. Tests were conducted at Wyle Labs on actual States Terminal Block/Transmitter and States Terminal Block/RTD circuits. The results of the tests (Wyle test 48842) indicate "that leakage is not a concern for Plant Hatch's inside and outside containment RTD circuits." (Southern Company Services letter LSH-NS-3937 dated 10-29-87.) The test results also indicated that leakage current, during the worst case event, will not exceed 0.2 ma. For most transmitter circuits, this represented a maximum error of only 1.25% of calibrated span during a High Energy Line Break (the "worst case" event).
2. For those Unit 1 and Unit 2 transmitter circuits where the test results indicated the circuits could experience the maximum error of 1.25%, a Justification for Continued Operation (JCO) was written and approved (Plant Review Board Meeting No. 87-129 on 11-6-87).

ENCLOSURE 1 (Continued)

TRANSCRIPTION OF NRC VIOLATION 50-321/86-35-02 AND 86-35-03,  
AND 50-366/86-35-03 and 86-35-04 (VIOLATION "A") AND GPC RESPONSE

Corrective steps which will be taken to avoid further violations:

1. Leakage current evaluations and test results for transmitter and RTD circuits containing States Terminal Blocks will be incorporated into the Environmental Qualification (EQ) Central File in the June, 1988, update.
2. For those transmitter circuits with the maximum, non-conservative, leakage current error of 1.25% of calibrated span, the States Terminal Blocks will be bypassed by splicing the circuit using qualified splices or the setpoints will be changed to account for the leakage current error. This will be done for the Unit 2 circuits during the current Unit 2 refueling outage (currently scheduled to end March, 1988) and for the Unit 1 circuits during the next Unit 1 refueling outage (currently scheduled to begin September 1988).

Date when full compliance will be achieved:

Full compliance was achieved on November 6, 1987, when the Unit 1 and Unit 2 test results and JCOs were reviewed and approved by the Plant Review Board.

ENCLOSURE 2

PLANT HATCH - UNITS 1, 2  
NRC DOCKETS 50-321, 50-366  
OPERATING LICENSES DPR-57, NPF-5  
TRANSCRIPTION OF NRC VIOLATION 50-321/86-35-01 AND 86-35-04,  
AND 50-366/86-35-02 and 86-35-05 (VIOLATION "B") AND GPC RESPONSE

TRANSCRIPTION OF VIOLATION "B"

10 CFR 50 Appendix B, Criterion XVII requires maintaining sufficient records to furnish evidence of activities affecting quality. Additionally, 10 CFR 50.49 paragraph (j) requires in part, that a record of the qualification, including documentation in paragraph (d) of this section must be maintained in an auditable form to permit verification that each item of equipment important to safety covered by this section is; (1) qualified for its application and, (2) meets its specified performance requirements when it is subjected to the conditions predicted to be present when it must perform its safety function.

Contrary to the above, at the time of the inspection:

1. EQ files QDP-14 and 29 did not adequately document qualification of Okonite cable and splices, in that a comparison of performance data taken during the LOCA test, and definitions of plant electrical performance requirements were not included in the file.
2. EQ file QDP-10 did not adequately document qualification of Target Rock solenoid valves, in that (1) the qualified life of the equipment was not determined, and (2) sufficient design information was not available to establish similarity between installed and tested equipment to verify the fail safe mode assigned to the valve.

This is a Severity Level IV violation (Supplement 1).



ENCLOSURE 2 (Continued)

TRANSCRIPTION OF NRC VIOLATION 50-321/86-35-01 AND 86-35-04,  
AND 50-366/86-35-02 and 86-35-05 (VIOLATION "B") AND GPC RESPONSE

RESPONSE TO VIOLATION "B"

Admission or denial of violation:

The violation occurred as cited in the Notice of Violation. However, Georgia Power Company (GPC) requests that the violation be downgraded from a Severity Level IV violation to a Severity Level V violation.

GPC bases this request on the guidance provided in 10 CFR Part 2, Appendix C, Section III (Severity of Violations) and 10 CFR Part 2, Appendix C, Supplement I, Subsection D (Severity IV) and Subsection E (Severity Level V).

These sections state that Severity Level IV (SL-IV) violations are less serious (than Severity Level III violation) but are of more than minor concern; i.e., if left uncorrected, they could lead to a more serious concern. This statement is a pivotal one in our justification for the lower severity level because Severity Level V (SL-V) violations are of minor safety or environmental concern. This particular violation could not have led to a more serious concern.

Additionally, the guidance provided in Supplement I, Subsections D and E provide guidelines for the assignment of the severity classification for a violation. Severity Level IV violations are normally assessed for the following reasons:

1. A less significant violation of a Technical Specification Limiting Condition for Operation where the appropriate Action Statement was not satisfied within the time allotted by the Action Statement.

ENCLOSURE 2 (Continued)

TRANSCRIPTION OF NRC VIOLATION 50-321/86-35-01 AND 86-35-04,  
AND 50-366/86-35-02 and 86-35-05 (VIOLATION "B") AND GPC RESPONSE

2. Failure to meet the requirements of 10 CFR 50.59 that does not result in a Severity Level I, II, or III violation.
3. Failure to meet regulatory requirements that have more than minor safety or environmental significance.
4. Failure to make a required Licensee Event Report.

Severity Level V violations are normally assessed only for violations that have minor safety or environmental significance.

GPC believes this violation does not satisfy the criteria for a SL-IV violation but clearly satisfies the criterion of a SL-V violation. The cited violation concerns documentation deficiencies that have a minor adverse impact. The justifications for this statement (evaluations showed the effects were insignificant, qualified equipment life in accordance with maintenance schedule, files contained sufficient information to show similarities) were provided to representatives of the NRC in an enforcement conference that was held in Region II Headquarters on 1/13/88. If the conditions detailed in the Notice of Violation were left uncorrected, these discrepancies would not lead to a serious safety concern. This conclusion is based on tests and analyses and, as discussed in the enforcement conference, were found to be of limited safety significance.

Reason for the violation:

The violation was the result of changing documentation requirements for Environmental Qualification (EQ) components.

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ENCLOSURE 2 (Continued)

TRANSCRIPTION OF NRC VIOLATION 50-321/86-35-01 AND 86-35-04,  
AND 50-366/86-35-02 and 86-35-05 (VIOLATION "B") AND GPC RESPONSE

A 1983 NRC review of the Plant Hatch environmental qualification program did not identify any problems with existing Okonite cable and splices performance/performance criteria documentation. Similarity concerns for Target Rock Solenoid Valves, expressed by the NRC during the 1983 review, were resolved at that time to the mutual satisfaction of the NRC and GPC.

A contributing cause to the event was personnel error on the part of GPC personnel. Specifically, in 1985 the EQ Central File was incorrectly revised to indicate the Target Rock Solenoid valves were qualified to the 10 CFR 50.49 standards. (The standards were established in late 1985.) In fact, the DOR guidelines (which did not require the establishment of a qualified life for the energized valves), were the applicable standards. Documentation to support qualification to the 10 CFR 50.49 standards was not in the EQ Central File in 1985.

Corrective steps which have been taken and the results achieved:

As a result of this event, the following corrective actions were implemented:

1. GPC, during the November, 1986, NRC inspection, obtained from Okonite the performance data for cable and splices and performed the required comparison evaluation. The performance data and the results of the evaluation supported qualification of Okonite cable and splices. This information was added to the EQ Central File in March, 1987.

ENCLOSURE 2 (Continued)

TRANSCRIPTION OF NRC VIOLATION 50-321/86-35-01 AND 86-35-04,  
AND 50-366/86-35-02 and 86-35-05 (VIOLATION "B") AND GPC RESPONSE

2. Adequate documentation to support the qualification of the Target Rock Solenoid Valves to the 10 CFR 50.49 standards was generated by GPC during the November, 1986, NRC inspection. This documentation included establishment of a qualified life for the valves and similarity between installed and tested components. This documentation was added to the EQ Central File in March 1987.

Corrective steps which will be taken to avoid further violations:

No further corrective actions are required to prevent recurrence.

Date when full compliance will be achieved:

Full compliance was achieved in March, 1987, when the EQ Central File was revised to include the required component qualification documentation.