

official file

FEB 02 1988

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

Georgia Power Company
ATTN: Mr. James P. O'Reilly
Senior Vice President-
Nuclear Operations
P. O. Box 4545
Atlanta, GA 30302

Gentlemen:

SUBJECT: ENFORCEMENT CONFERENCE SUMMARY
(NRC INSPECTION REPORT NOS. 50-321/86-35 AND 50-366/86-35)

This letter refers to the Enforcement Conference held at our request on January 13, 1988. This meeting concerned activities authorized at your Hatch facility. The issues discussed at this conference related to environmental qualification. A list of attendees, summary and a copy of your handout are enclosed. We are continuing our review of these issues to determine the appropriate enforcement action.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Should you have any questions concerning this matter, please contact us.

Sincerely,

M. L. Ernst /
for

J. Nelson Grace
Regional Administrator

Enclosures:

1. List of Attendees
2. Enforcement Conference Summary
3. Handout

cc w/encls:

- ✓ J. T. Jeckham, Vice President, Plant Hatch
- ✓ H. C. Nix, Plant Manager
- ✓ W. M. Fraser, Site Quality Assurance (QA)
Supervisor
- ✓ K. Gucwa, Manager, Nuclear Safety
and Licensing

bcc w/encls: (See page 2)

8802090007 880202
PDR ADOCK 05000321
Q PDR

IE01

bcc w/encls:

- ✓ NRC Resident Inspector
- ✓ DRS Technical Assistant
- ✓ Hugh S. Jordan, Executive Secretary
- ✓ W. Liberman, DOE
- G. R. Jenkins, EICS
- Document Control Desk
- State of Georgia

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01/20/88

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LReyes
01/27/88

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GJenkins
01/29/88

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01/27/88

ENCLOSURE 1

LIST OF ATTENDEES

NRC - Region II

M. Ernst, Deputy Regional Administrator
R. Goddard, Regional Counsel
A. Gibson, Director, Division of Reactor Safety (DRS)
G. Jenkins, Director, Enforcement and Investigation
Coordination Staff (EICS)
C. Hehl, Deputy Director, Division of Reactor Projects (DRP)
E. Merschhoff, Deputy Director, DKS
A. Heidt, Chief, Engineering Branch, DRS
M. Sinkule, Chief, Projects Section 3B, DRP
T. Conlon, Chief, Plant Systems Section, DRS
B. Uryc, Enforcement Coordinator, EICS
P. Holmes-Ray, Senior Resident Inspector, Hatch
J. Menning, Resident Inspector, Hatch
N. Merriweather, Reactor Inspector, DRS
P. Balmain, Acting Project Engineer, DRP

NRC - Office Of Nuclear Reactor Regulation

L. Crocker, Project Manager, Hatch, Project Directorate II-3

Georgia Power Company

J. O'Reilly, Senior Vice President, Nuclear Operations
J. Beckham, Vice President, Plant Hatch
L. Gucwa, Manager, Nuclear Safety and Licensing (NSL)
T. Powers, Engineering Manager, Plant Hatch
S. Tipps, Nuclear Safety and Compliance Manager, Plant Hatch
J. Kane, Engineering, Maintenance and Outage Planning Manager
J. Heidt, Licensing Manager
J. Puckett, Assistant to Manager, NSL
D. Madison, Manager, Hatch Engineering and Projects
J. Branum, Senior Nuclear Engineer
K. Whitt, Generation Engineer
K. King, Onsite EQ Coordinator, Hatch

Southern Company Services

C. Pierce, Senior Nuclear Engineer

ENCLOSURE 2

ENFORCEMENT CONFERENCE SUMMARY

On January 13, 1988, an Enforcement Conference was held with representatives of Georgia Power Company (GPC) and the NRC. The conference was held at the request of the NRC at the NRC, Region II Office located in Atlanta, Georgia. The main topics of discussion were deficiencies noted in the implementation of an environmental qualification (EQ) program to meet the requirements of 10 CFR 50.49. GPC's position regarding the Potential Enforcement/Unresolved Items was presented during the conference and copies of view graphs which were used to support this position are contained in Enclosure 3.

GPC's position was that they have a strong and aggressive EQ program at plant Hatch as evidenced by a great deal of GPC resources and facilities committed to support the program. In addition, GPC felt that no safety concerns were involved with the deficiencies identified by the NRC.

ENCLOSURE 3

NUCLEAR REGULATORY COMMISSION
ENFORCEMENT CONFERENCE

**GEORGIA POWER COMPANY
PLANT HATCH**

ENVIRONMENTAL QUALIFICATION

JANUARY 13, 1988



Georgia Power

the southern electric system

AGENDA

- | | | |
|-------|---|--|
| 10:00 | OPENING REMARKS | JAMES P. O'REILLY
SR. VICE PRESIDENT |
| 10:10 | REGULATORY
REQUIREMENTS
& INITIATIVES | L. T. GUCWA
MGR. NUCLEAR SAFETY |
| 10:30 | DISCUSSION OF
EQ ISSUES | J. P. KANE
MGR. ENGINEERING |
| 11:15 | EQ PROGRAM
OVERVIEW | J. T. BECKHAM, JR.
VICE PRESIDENT-PLANT HATCH |
| 11:30 | CLOSING REMARKS | JAMES P. O'REILLY |

OPENING REMARKS

- GPC HAS STRONG ENVIRONMENTAL QUALIFICATION PROGRAM
 - + PLANT HATCH
 - + PLANT VOGTLE

- PROGRAM COMMENDED BY NRC INSPECTION TEAM

- NO PROGRAMMATIC DEFICIENCIES IDENTIFIED BY NRC

- NO SAFETY CONCERNS IDENTIFIED BY NRC

- NRC INTERPRETATIONS AND ENFORCEMENT CRITERIA

REGULATORY REQUIREMENTS
& INITIATIVES

CONFORMANCE TO 10 CFR 50.49

- COMPLEX REQUIREMENTS PROMPTLY MET
- EXTENSIVE DOCUMENTATION SUBMITTED
- EQ "LIVING PROGRAM"
- COMPLIANCE INTEGRAL PART OF PLANT ACTIVITIES
- ANNUAL QA AUDITS

PROACTIVE PROGRAM
TO ASSURE COMPLIANCE

INDUSTRY/REGULATORY INITIATIVES

- GPC INVOLVEMENT IN NUCLEAR UTILITY GROUP FOR EQUIPMENT QUALIFICATION
 - + NEW ISSUES
 - + WORK CLOSELY WITH NRC
 - + TERMINAL BLOCKS, LIMITORQUES, SPLICES AND SOLENOID VALVES

- GPC INVOLVEMENT WITH INDUSTRY
 - + REVIEW OF INDUSTRY EVENTS
 - + REVIEW OF GE SIL'S
 - + REVIEW OF GE SAL'S
 - + REVIEW OF PDR INFORMATION
 - + CLOSE COMMUNICATION WITH
 - AE'S
 - VENDORS
 - + DEDICATED EQ GROUP
 - + GPC FOREST PARK SERVICES FACILITY

GPC ACTIVELY INVOLVED
IN EQ RELATED ISSUES

DISCUSSION OF
EQ ISSUES

OKONITE CABLE AND SPLICE TAPE

ISSUE NUMBER 1

- GPC FILES DID NOT CONTAIN DATA ON INSULATION RESISTANCE VALUES

SAFETY FUNCTION

- CABLE AND SPLICES ARE USED IN INSTRUMENTATION AND EQUIPMENT CIRCUITS

LICENSING CONSIDERATIONS

- EQUIPMENT OPERABILITY WAS NOT A CONCERN
- NO IDENTIFIED SAFETY ISSUES
- ISSUE CONCERNS DOCUMENTATION

OKONITE CABLE AND SPLICE TAPE

ISSUE NUMBER 1 (CONTINUED)

GPC ACTIONS

- DEPTH OF REQUIRED DOCUMENTATION HAS EVOLVED OVER YEARS
- TEST DATA WAS OBTAINED DURING THE AUDIT
- EVALUATIONS HAVE BEEN PERFORMED TO IDENTIFY THE ACCEPTABILITY OF THE INSULATION RESISTANCE VALUES
- EVALUATIONS SHOW THAT THE EFFECTS ARE INSIGNIFICANT

GPC RESOLVED ALL
CONCERNS DURING AUDIT

TARGET ROCK SOLENOID VALVES

ISSUE NUMBER 2

- 1) THE QUALIFIED LIFE FOR ENERGIZED VALVES WAS NOT DETERMINED

- 2) SIMILARITY BETWEEN THE TESTED AND INSTALLED MODELS WAS NOT SHOWN

SAFETY FUNCTION

- CONTAINMENT ISOLATION

LICENSING CONSIDERATIONS

- EQUIPMENT OPERABILITY WAS NOT A CONCERN

- NO IDENTIFIED SAFETY ISSUES

- ISSUE CONCERNS DOCUMENTATION

TARGET ROCK SOLENOID VALVES

ISSUE NUMBER 2 (CONTINUED)

GPC ACTIONS

- RATHER THAN DOR INTERNAL DOCUMENTATION REFLECTED 10 CFR 50.49 STANDARDS
- A QUALIFIED LIFE CONSISTENT WITH THE EXISTING MAINTENANCE SCHEDULE WAS DEMONSTRATED
- GPC FILES CONTAINED DOCUMENTATION TO ESTABLISH SIMILARITY
- A PURCHASE PART DRAWING WAS OBTAINED DURING THE AUDIT WHICH SUPPORTED THE PREVIOUS SIMILARITY ANALYSIS

GPC RESOLVED ALL
CONCERNS DURING AUDIT

ROSEMOUNT 1153B TRANSMITTERS QDP26

ISSUE NUMBER 3

- ERRORS DUE TO LEAKAGE CURRENT IN TERMINAL BLOCKS FOR OUTSIDE CONTAINMENT TRANSMITTER CIRCUITS WERE NOT ADDRESSED

SAFETY FUNCTION

- PROVIDE TRIP SIGNALS AND INDICATION

LICENSING CONSIDERATIONS

- EQUIPMENT OPERABILITY WAS NOT A CONCERN
- NO IDENTIFIED SAFETY ISSUES
- ISSUE CONCERNS DOCUMENTATION

ROSEMOUNT 1153B TRANSMITTERS QDP26

ISSUE NUMBER 3 (CONTINUED)

GPC ACTIONS

- CALCULATIONS PERFORMED DURING THE AUDIT REVEALED AN ACCEPTABLE ERROR

- NRC INSPECTORS CONCLUDED THAT NO SAFETY CONCERN EXISTED

- GPC INITIATED A TEST AT WYLE LABS ON ACTUAL STATES TERMINAL BLOCK/TRANSMITTER CIRCUIT

- GPC EVALUATED ALL TRANSMITTER CIRCUITS USING TEST ERROR VALUES AND FOUND THEM ACCEPTABLE

ROSEMOUNT 1153B TRANSMITTER

ISSUE NUMBER 3 (CONTINUED)

CONCLUSIONS

- PLANT HATCH LOOP CALCULATIONS WERE PERFORMED USING ATTS METHODOLOGY
 - METHODOLOGY WAS REVIEWED IN DETAIL BY NRC
 - TERMINAL BLOCK LEAKAGE CURRENT WAS NOT REQUIRED TO BE ADDRESSED IN THESE CALCULATIONS

- PLANT HATCH TRANSMITTER CIRCUITS ARE LOCATED OUTSIDE CONTAINMENT

- PLANT HATCH SPONSORED TEST RESULTS VERIFIED A SMALL BUT MEASURABLE LEAKAGE CURRENT FOR PLANT HATCH CONFIGURATIONS

LEAKAGE CURRENT HAS MINIMAL EFFECT
ON LOOP ACCURACY AND IS INSIGNIFICANT
FOR PLANT HATCH APPLICATIONS

STATES TERMINAL BLOCKS (ZWM AND NT). QDP 4

ISSUE NUMBER 4

- GPC HAD NOT DETERMINED AN ALLOWABLE ERROR FOR LEAKAGE CURRENT IN TERMINAL BLOCKS FOR IN-CONTAINMENT RTD CIRCUITS

SAFETY FUNCTION

- POST ACCIDENT MONITORING

LICENSING CONSIDERATIONS

- EQUIPMENT OPERABILITY WAS NOT A CONCERN
- ISSUE CONCERNS DOCUMENTATION
- NO IDENTIFIED SAFETY ISSUES

STATES TERMINAL BLOCKS (ZWM AND NT). QDP 4

ISSUE NUMBER 4 (CONTINUED)

GPC ACTIONS

- GPC HAD PREVIOUSLY ADDRESSED RTD
CIRCUIT TERMINAL BLOCK LEAKAGE
CURRENT IN RESPONSE TO IEN 84-47
- DETAILED CALCULATIONS PERFORMED DURING
THE AUDIT SHOWED LESS THAN 1 DEGREE
FAHRENHEIT ERROR
- GPC INITIATED A TEST AT WYLE LABS
ON AN ACTUAL STATES TERMINAL
BLOCK/RTD CIRCUIT

STATES TERMINAL BLOCKS (ZWM AND NT). QDP 4

ISSUE NUMBER 4 (CONTINUED)

CONCLUSION

- TERMINAL BLOCK LEAKAGE CURRENT HAS BEEN ANALYZED AND IS ACCEPTABLE FOR PLANT HATCH APPLICATIONS
- GPC SPONSORED TESTING DEMONSTRATED NO MEASURABLE ERROR FOR RTD CIRCUITS WITH TERMINAL BLOCKS LOCATED INSIDE CONTAINMENT
- THE ALLOWABLE ERROR IS A PARAMETER USED TO DESIGN THE CIRCUIT

AN ALLOWABLE ERROR WAS NOT
AND NEED NOT BE ESTABLISHED

LIMITORQUE VALVE OPERATORS

ISSUE NUMBER 5

- UNIDENTIFIED AND/OR UNQUALIFIED INTERNAL CONTROL WIRING

SAFETY FUNCTION

- PROVIDE ISOLATION FUNCTION AND ALLOW SYSTEM OPERATION

LICENSING CONSIDERATIONS

- AT NO TIME WAS ANY EQUIPMENT INOPERABLE
- INDUSTRY CONFUSION ABOUT JCO WAS NOT RESOLVED UNTIL 7/86 (DRAFT GL-86-15)
- THE UNIT 1 JCO WAS GENERICALLY APPLICABLE TO UNIT 2

LIMITORQUE VALVE OPERATORS

ISSUE NUMBER 5 (CONTINUED)

GPC ACTIONS

- PROMPTLY DEVELOPED A WALKDOWN PROGRAM
 - + DEFICIENCY REPORT ADDRESSED OPERABILITY
 - + INSPECTION OF UNIT 1 VMOs WAS COMPLETED IN JULY, 1986
 - + INSPECTION OF UNIT 2 VMOs WAS COMPLETED PRIOR TO RESTART IN FALL, 1986
- ENGINEERING EVALUATIONS WERE PERFORMED TO DEMONSTRATE PLANT OPERABILITY

GPC RESPONDED TO IEN 86-03
IN A TIMELY AND RESPONSIBLE MANNER

PLANT HATCH EQ
PROGRAM OVERVIEW

EQUIPMENT QUALIFICATION AT PLANT HATCH

- INTEGRATED PROGRAM AMONG MANY AREAS
- AN ONGOING WAY OF LIFE

INTEGRATED PROGRAM

- INVOLVES OFFSITE AND ONSITE PERSONNEL
- REQUIRES AWARENESS OF EQ BY ALL CONCERNED
- REQUIRES CLOSE COORDINATION AMONG ALL GROUPS
- REQUIRES CORPORATE SUPPORT AND OVERVIEW

HATCH EQ PROGRAM
ENCOMPASSES ALL OF
THESE ELEMENTS

ORGANIZATIONS INVOLVED ONSITE

ENGINEERING

MAINTENANCE

GENERAL SUPPORT

OUTAGES AND PLANNING

NUCLEAR SAFETY & COMPLIANCE

OPERATIONS

QUALITY ASSURANCE

ORGANIZATIONS INVOLVED OFFSITE

GPC CORPORATE

SOUTHERN COMPANY SERVICES

BECHTEL

NSSS VENDOR

OTHER SUPPLIERS

AN ONGOING WAY OF LIFE

- APPROXIMATELY 24,000 MAINTENANCE MANHOURS EXPENDED ON EQ ACTIVITIES DURING 1987
- 399 EQ ACTIVITIES PERFORMED DURING UNIT 1 REFUELING OUTAGE
- 1000 MWOs PERFORMED ON EQ RELATED EQUIPMENT IN 1987
- APPROXIMATELY 18,000 ENGINEERING MANHOURS EXPENDED ON EQ ACTIVITIES IN 1987
- 512 EQ ACTIVITIES SCHEDULED FOR UNIT 2 OUTAGE
- PROCEDURES AND ASSOCIATED PROGRAMS KEPT CURRENT
- NEW ISSUES HANDLED EXPEDITIOUSLY