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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 88-17

Gentlemen:

In response to your letter of July 21, 1988, and in accordance with the provisions of 10 CFR 2.201, Georgia Power Company (GPC) is providing the enclosed response to the Notice of Violation associated with Inspection Report 88-17. 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,

R. P. McDonald

JJP/lg

Enclosures:
1. Violation 88-17-01 and GPC Response
2. Violation 88-17-03 and GPC Response
3. Deviation 88-17-02 and GPC Response

c: (see next page)

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ENCLOSURE 1

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
VIOLATION 88-17-01 AND GPC RESPONSE

VIOLATION 88-17-01

Technical Specification 6.8.1.a requires that written procedures be established, implemented, and maintained as recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, recommends procedures for startup, operation, and shutdown of safety-related systems.

Contrary to the above, on June 8, 1988, the system operating procedure for the diesel generator building ventilation system was found to be inadequately established and implemented as follows:

1. The Unit 1 procedure for the diesel generator building ventilation system, 34SO-X41-001-1N, Revision 1, was not designated as a safety-related procedure or approved by the appropriate member of plant management as required. The Unit 2 procedure, 34SO-X41-001-2, Revision 0, was designated as safety-related.

2. The Unit 1 and Unit 2 diesel generator building ventilation system operating procedures were inadequate in that both procedures required verification of the 1B (swing) diesel exhaust fan thermostats operation to different temperature settings. The Unit 2 procedure required the exhaust fan thermostats to operate at 87°F for X41-N004B and 85°F for X41-N005B, but the Unit 1 procedure required both X41-N004B and X41-N005B to operate at 55°F. In addition, further evaluation of the procedure found all the thermostat settings for all of the Unit 1 diesel generator room's exhaust fans, V-1 and V-2, and two heater thermostats, H-1 and H-2, to be incorrect and not in agreement with plant design data referenced on system Piping and Instrumentation Diagram H-12619, Revision 5.

ENCLOSURE 1 (Continued)

VIOLATION 88-17-01 AND GPC RESPONSE

3. The 1B and 2C diesel generator oil storage room exhaust fans were not aligned per procedure which required one fan switch to be in the RUN position and the other fan switch to be in the STANDBY position. Both of the 1B fans were found in RUN and both of the 2C fans were found in STANDBY. The 2C battery room exhaust fans switches were both found in the PRIMARY position instead of one in PRIMARY and the other in STANDBY as designated in the procedures.

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

RESPONSE TO VIOLATION 88-17-01

For clarity, each of the three examples will be discussed separately.

Admission or denial of violation:

The violation is admitted. The system operating procedures for the diesel generator building ventilation system were not adequately established and implemented.

Reason for the violation:

The root cause of example 1 of the violation was inadequate procedure review. Plant procedure 34SO-X41-001-1N (originally HNP-1-1488), "Diesel Generator Building Ventilation System," was classified initially as non-safety related. Subsequent revisions did not correct the safety classification.

ENCLOSURE 1 (Continued)

VIOLATION 88-17-01 AND GPC RESPONSE

The root cause of example 2 of the violation was inadequate procedure review. Incorrect thermostat settings were incorporated into plant procedures 34SO-X41-001-1N and 34SO-X41-001-2S, "Diesel Generator Building Ventilation System," but these errors were not detected and corrected in subsequent procedure revisions. A contributing factor may have been an incorrect plant drawing. Plant drawing H-12619 required thermostat settings which, in some cases, were outside the range of the installed thermostats. This may have led to confusion as to what settings to put in the system operating procedures.

The root cause of example 3 of the violation can not be determined positively, but is likely personnel error by person or persons unknown.

Corrective steps which have been taken and the results achieved:

As a result of the events described in the violation, the following corrective actions were implemented:

1. As-Built Notice (ABN) 88-372 was issued against plant drawing H-12619 to correct the required thermostat settings. The drawing's settings are now within the range of the installed thermostats.

2. Procedures 34SO-X41-001-1N and 34SO-X41-001-2S were revised temporarily to reflect the corrected thermostat settings per ABN 88-372. The thermostats were set per the revised procedures and the plant drawing.

3. The fan switches were aligned as required by the system operating procedures.

VIOLATION 88-17-01 AND GPC RESPONSE

In addition, procedure 10AC-MGR-003-0S, "Preparation and Control of Procedures," now requires Nuclear Safety and Compliance (NSC) to provide a written justification for each revised (except cancellations) and new procedure classified as non-safety related. This written justification becomes part of the permanent history maintained in Document Control of that procedure. If justification for non-safety classification, as determined by criteria given in procedure 10AC-MGR-003-0S, can not be provided, NSC ensures the classification is changed to safety-related before the revised/new procedure is issued.

Corrective steps which will be taken to avoid further violations:

For the event described in example 1, procedure 34S0-X41-001-1N will be revised to change its classification to safety related. This revision will be in place by 10/28/88.

For the event described in example 2, procedures 34S0-X41-001-1N and 34S0-X41-001-2S will be revised to make permanent the temporary changes described above. These revisions will be in place by 10/28/88.

For the event described in example 3, a monitoring program will be put into effect by 8/25/88. The monitoring program, which will last for approximately two months, will monitor thermostat settings and control switch positions at least weekly to identify recurring problems and their cause(s). Should recurring problems be identified, further corrective actions, such as placing locked, plastic boxes over the thermostats and switches, will be taken.

Date when full compliance will be achieved:

For the first event, full compliance will be achieved on 10/28/88 when the revision to procedure 34S0-X41-001-1N is effective.

ENCLOSURE 1 (Continued)

VIOLATION 88-17-01 AND GPC RESPONSE

For the second event, full compliance will be achieved on 10/28/88 when the revisions to procedures 34SO-X41-001-1N and 34SO-X41-001-2S are effective.

For the third event, full compliance was achieved on 6/10/88 when the fans' control switches were aligned as required by the system operating procedure.

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ENCLOSURE 2

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
VIOLATION 88-17-03 AND GPC RESPONSE

VIOLATION 88-17-03

Technical Specification 6.8.1.a requires that written procedures be established, implemented, and maintained for the applicable activities in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, recommends procedures for operation of the condensate system and for plant startup.

Procedure 34SO-N21-007-2S, "Condensate and Feedwater System," provides written instructions for operation of the Unit 2 condensate and feedwater system.

Procedure 34GO-OPS-001-1S, "Plant Startup," provides written instructions for the startup of Unit 1.

Contrary to the above, these two procedures were inadequate as noted below:

1. On May 27, 1988, operations personnel attempted to fill and vent Unit 2 condensate pump 2N21-C001B with the unit operating at power. This particular operation was not covered in Procedure 34SO-N21-007-2S. In the absence of instructions in this procedure, air was inadvertently introduced into the condensate and feedwater system. This resulted in trips of the condensate booster and reactor feed pumps and ultimately resulted in the automatic scram of Unit 2.

ENCLOSURE 2 (Continued)

VIOLATION 88-17-03 AND GPC RESPONSE

2. On May 20, 1988, operations personnel improperly swapped the Unit 1 drywell pneumatic supply from instrument air to nitrogen. Procedure 34GO-OPS-001-1S did not specifically require this operation to be done in accordance with Data Package 5 of Procedure 34SO-P70-001-1S, "Drywell Pneumatic System." In the absence of clear instructions, an improper valve lineup was established. This resulted in the inadvertent closing of several main steam isolation valves and ultimately in the automatic scram of Unit 1.

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

RESPONSE TO VIOLATION 88-17-03

For clarity, each of the two examples will be discussed separately. The event described in example 1 was reported by Georgia Power Company (GPC) in Licensee Event Report (LER) 50-366/1988-017 dated 5/27/88. The event described in example 2 was reported by GPC in LER 50-321/1988-009 dated 5/20/88.

Admission or denial of violation:

The violation is admitted. The plant procedures discussed in the two examples constituting the violation were inadequate and resulted in reactor scrams.

ENCLOSURE 2 (Continued)

VIOLATION 88-17-03 AND GPC RESPONSE

Reason for the violation:

The root cause of example 1 of the violation was a deficient procedure. Specifically, plant procedure 34SO-N21-007-2S, "Condensate and Feedwater System," did not give instructions for filling and venting a condensate pump while the unit was on line. A contributing cause is the infrequency at which this evolution is performed while the unit is on line. Consequently, plant personnel did not anticipate the potential for air binding of the operating condensate pumps using the chosen fill and vent methodology.

The root cause of example 2 of the violation was a deficient procedure. Specifically, plant procedure 34GO-OPS-001-1S, "Plant Startup," lacked clarity in that it did not explicitly require swapping of drywell pneumatic supply from instrument air to nitrogen be done in accordance with Data Package 5 of plant procedure 34SO-P70-001-1S, "Drywell Pneumatic System." As a result, an improper valve lineup was established.

Corrective steps which have been taken and the results achieved:

As a result of the event described in example 1, the following corrective actions were implemented:

1. Involved personnel were made aware verbally of the cause and consequences of the event.

2. Revisions to the Unit 1 and Unit 2 condensate and feedwater system operating procedures (34SO-N21-007-1S and 34SO-N21-007-2S) were initiated. The revisions will include specific instructions on filling and venting the condensate pumps during power operations.

As a result of the event described in example 2, the following corrective actions were implemented:

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ENCLOSURE 2 (Continued)

VIOLATION 88-17-03 AND GPC RESPONSE

1. Licensed personnel restored outboard nitrogen supply isolation valves 1P70-F025A and 1P70-F025B to their proper position. This restored nitrogen supply to the Drywell Pneumatic System and, consequently, the main steamline isolation valves.

2. Procedure 34GO-OPS-001-1S was revised temporarily on 5/20/88 to add the requirement to restore the Drywell Pneumatic System to its normal, nitrogen supply using the system operating procedure, 34SO-P70-001-1S.

3. Procedure 34SO-P70-001-1S was revised temporarily on 5/20/88 to delete the requirement to close the outboard nitrogen supply isolation valves 1P70-F025A and 1P70-F025B when swapping from nitrogen supply to instrument air supply. This reduced the chances of this event recurring by alleviating the need to open these valves when swapping from instrument air supply to the normal, nitrogen supply while still providing adequate personnel safety.

Corrective steps which will be taken to avoid further violations:

For the event described in example 1, procedures 34SO-N21-007-1S and 34SO-N21-007-2S will be revised by 11/01/88. The revisions will provide specific instructions on filling and venting the condensate pumps during power operations.

For the event described in example 2, procedures 34GO-OPS-001-1S and 34SO-P70-001-1S will be revised permanently by 11/30/88. These revisions will make permanent the temporary changes described above.

Date when full compliance will be achieved:

For the first event, full compliance will be achieved on 11/01/88 when the revised procedures 34SO-N21-007-1S and 34SO-N21-007-2S are effective.

ENCLOSURE 2 (Continued)

VIOLATION 88-17-03 AND GPC RESPONSE

For the second event, full compliance will be achieved on 11/30/88 when the permanent revisions to procedures 34SO-OPS-001-1S and 34SO-P70-001-1S are effective.

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ENCLOSURE 3

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
DEVIATION 88-17-02 AND GPC RESPONSE

DEVIATION 88-17-02

Unit 2 Final Safety Analysis Report (FSAR), Section 9.4.5.4, "Tests and Inspections," states that all components of the diesel generator building heating and ventilation system were preoperationally tested before placing the system in service and have been periodically tested thereafter. FSAR Table 9.4-10, "Diesel Generator Building Heating and Ventilation System Failure Analysis," lists exhaust fans, heaters, and louvers as components of the system and describes malfunctions of the system as failures of the louvers, heater or controls, and fans or controls.

Contrary to the above, on June 8, 1988, the inspector found various thermostat settings for like controls of the diesel generator room exhaust fans and heaters and switchgear room exhaust fans. One section of the two-section, wall mounted, air-inlet louvers to switchgear rooms 2G and 2F were found to have failed in the shut position and one louver section for room 2F was partially shut. A review of the instrument calibration and surveillance test tracking master listing found that the thermostat controls are not periodically tested. No instructions could be found that checks the dampers ability to open.

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ENCLOSURE 3 (Continued)

DEVIATION 88-17-02 AND GPC RESPONSE

RESPONSE TO DEVIATION 88-17-02

Reason for the deviation:

The root cause of the deviation is a failure to implement the Unit 2 Final Safety Analysis Report (FSAR) requirements to test periodically the thermostat controls and the dampers' ability to open. The thermostat controls had no assigned calibration frequency, except "as required," because they had been listed on the Instrument and Controls (I & C) calibration program as "non-critical" instruments.

Corrective steps which have been taken and the results achieved:

As a result of this event, the thermostat controls have been assigned a calibration frequency on the I & C calibration program. These controls will be tested (i.e., calibrated) periodically as required by the Unit 2 FSAR.

Corrective steps which will be taken to avoid further deviations:

A procedure to test thermostat and damper operation on a periodic basis will be developed and issued.

Date when corrective action will be completed:

Full compliance will be achieved on 12/15/88 when a procedure to test thermostat and damper operation will be issued.