

May 6, 1988

Docket Nos.: 50-321  
50-366

Mr. R. P. McDonald  
Executive Vice President  
Nuclear Operations  
Georgia Power Company  
P. O. Box 4545  
Atlanta, Georgia 30302

Dear Mr. McDonald:

Subject: Request for Additional Information - Response to Generic Letter  
83-28, Hatch Units 1 and 2

By letters dated November 7, 1983, February 29, 1984 and June 3, 1985, Georgia Power Company responded to Item 2.2 (Part 1) of Generic letter 83-28. Review of the responses to date has indicated several areas where additional information is required in order to complete the review.

The additional information requested is indicated in the enclosure, which provides the review guidelines used by the staff, the results of the evaluation to date, and the additional information needed to complete the review. It is requested that your response be provided within 60 days of receipt of this letter.

The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P. L. 96-511.

Please contact me if you have any questions.

Sincerely,

Original signed by:

Lawrence P. Crocker, Project Manager  
Project Directorate II-3  
Division of Reactor Projects I/II

Enclosure:  
Request for Additional Information

cc: See next page

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Mr. R. P. McDonald  
Georgia Power Company

Edwin I. Hatch Nuclear Plant,  
Units Nos. 1 and 2

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EDWIN I. HATCH PLANT, UNITS 1, 2  
DOCKET NOS. 50-321/366  
REQUEST FOR ADDITIONAL INFORMATION  
FOR GENERIC LETTER 83-28, ITEM 2.2 (PART 1)

The licensee for the Edwin I. Hatch Plant, Units 1, 2 responded to Item 2.2 (Part 1) of Generic Letter 83-28 by submittals dated November 7, 1983, February 29, 1984 and June 3, 1985. The staff has reviewed these responses and finds additional information is needed for some of the sub-items of Item 2.2 (Part 1). The review guidelines used by the staff for these sub-items are listed below, followed by a brief evaluation of the applicant's submittals, and a listing of what the staff concludes is necessary to complete this item.

Item 2.2.1-Program  
Requested Information

Licensees and applicants should submit a program description which provides assurance that safety-related components are designated as safety-related on plant documents, drawings, procedures, and in information handling systems that are used in accomplishing safety-related activities such as work orders for repair, maintenance, and surveillance testing and orders for procurement of replacement parts.

Evaluation

The licensee's response stated that, currently, the equipment Location Index (ELI) for unit 1 is controlled by Southern Company Services and the ELI for unit 2 is controlled by Bechtel and that there are associated procedures which govern these ELIs. In their June 3, 1985 response, the licensee stated that the ELI was being upgraded by using System Evaluation Documents (SEDs) and that

each component would be classified as safety-related, non-safety-related, active, or passive according to its determined status. The licensee's response does not, however, confirm that all safety-related components are identified as such on plant documentation and in information handling systems that are used in the plant to control activities that may affect these components or that these systems and programs are consistent between units 1 and 2.

### Conclusion

We conclude that the licensee's response is not complete because they have not confirmed that all safety-related components are designated as such on plant documentation and in information handling systems used in the plant to control activities that may affect these components and they have not confirmed that these programs and systems are consistent between units 1 and 2. The licensee should provide information addressing these concerns as part of their response to the identified sub-items.

### Item 2.2.1.2-Information Handling System

#### Requested Information

The licensee or applicant should confirm that the program for equipment classification includes an information handling system that is used to identify safety-related components. The response should confirm that this information handling system includes a list of safety-related equipment and that procedures exist which govern its development, maintenance and validation.

### Evaluation

The licensee's response states that each unit had an information handling system which was a listing of equipment called the Equipment Location Index (ELI) that was used to control classification of equipment and was controlled by Southern Company Services for Unit 1 and Bechtel for Unit 2. The response

stated that equipment components were not specifically classified by this listing (ELI) as safety-related but were designated "Q" or "Non-Q," with the "Q" designation being applied to many components that were not safety-related. The licensee's June 3, 1985 response stated that the ELIs were being upgraded and would include specific designation of each component as safety-related or non-safety-related based on a detailed functional analysis of each plant system. Administrative procedures will control the use of the ELI and its maintenance since the system evaluation documents will be controlled documents. The licensee has not confirmed the completion of this upgrade, its implementation or that the procedures used by Southern Company Services and Bechtel to govern the development, maintenance and validation of the ELIs are consistent so that the same criteria and conditions for classification and control are used for both units 1 and 2.

#### Conclusion

The licensee's response is incomplete. They should verify that procedures used by both Southern Services for unit 1 and Bechtel for unit 2 to govern the development, maintenance and validation of the upgraded ELIs are consistent so that the same criteria and conditions for classification and control are used for both units 1 and 2. In addition, the licensee should confirm that this ELI upgrade program has been completed and is implemented for both units.

#### Item 2.2.1.3-Use of Equipment Classification Listing Requested Information

The licensee's or applicant's description should confirm that the program for equipment classification includes criteria and procedures that govern how station personnel use the equipment classification information handling system to determine that an activity affects safety-related components, and to identify the appropriate procedures to be used in performing maintenance, surveillance, parts replacement, and other activities defined in the introduction to 10CFR 50, Appendix B, that apply to those safety-related components.

### Evaluation

The licensee states in the February 29, 1984 response that quality requirements for maintenance requests and purchase requisitions are determined by the quality control department through their use of the ELI. In addition, station administrative procedures provide control over design, change, maintenance, procedure use and control, procurement, quality assurance and quality control. The licensee's response of June 3, 1985 states that the information needs for plant operation are frequently different from those of the designer and for this reason the ELI had not been found completely satisfactory for plant activity and material control and therefore both activities were not well supported by one relatively inflexible document. The licensee's response did not address the use of the upgraded ELI by station personnel to determine when plant activities are safety-related. Also, the response did not describe how the use of the upgraded ELIs determines whether safety or non-safety-related procedures and methods are to be used for accomplishing maintenance work, routine surveillance tests, design changes, procurement of replacement parts, and performance of special tests or studies.

### Conclusion

The licensee's response did not address the concerns of this item. They should revise their response to confirm the use of the upgraded ELI to determine when plant activities are safety-related and to describe how the upgraded ELI is used to determine whether safety-related or non-safety-related procedures and methods are to be used for accomplishing the plant activities identified above that may affect these components.

### Item 2.2.1.5-Design Verification and Procurement

#### Requested Information

The applicant's or licensee's submittal should document that past usage demonstrates that appropriate design verification and qualification testing are specified for the procurement of safety-related components and parts. The specifications should include qualification testing for expected safety

service conditions and should provide support for the applicant's/licensee's receipt of testing documentation to support the limits of life recommended by the supplier. If such documentation is not available, confirmation that the present program meets these requirements should be provided.

#### Evaluation

The licensee's response states only that station procedures have been established to ensure that design verification and qualification testing is specified for procurement of safety-related equipment. These procedures have not been identified or described, nor were copies of these procedures included for review.

#### Conclusion

We conclude that the licensee's response does not show that the procurement specifications specifically require the supplier to include verification of design capability and evidence of testing that qualifies the components and parts for service under the expected conditions over the life of the component or part. The licensee should identify and briefly describe the plant procedures which control the specification of design verification and qualification testing for procurement of safety-related parts and equipment.