NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
PLANT HATCH, UNIT 1	0 5 0 0 0 3 2 1	1 OF 0 6

TITLE (4)

DEFICIENT PROCEDURE ALLOWS CONFIGURATION WHERE MONITORS DO NOT MEET OPERABILITY REQUIREMENT

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
0 5	2 5	8 8	8 8	0 1 0	0 0	0 6	2 2	8 8		0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9)	2	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
POWER LEVEL (10)	0 0 1	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
		20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
Steven B. Tipps, Manager Nuclear Safety and Compliance, Hatch	AREA CODE 9 1 2 3 6 7 - 7 8 5 1

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	

SUPPLEMENTAL REPORT EXPECTED (14)

		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On 5/25/88 at approximately 1630 CDT, Unit 1 was in startup mode at an approximate power level of 25 MWt (approximately one percent of rated thermal power). At that time, plant personnel determined that the configuration of the Recombiner Building Ventilation Radiation Noble Gas Monitors (EIIS Code IL) would not annunciate an inoperable or downscale condition in the main control room. As such, a configuration existed where the Technical Specifications required annunciation would be defeated. This is a condition prohibited by the plant's Technical Specifications.

The root cause of this event was determined to be procedure inadequacy. Specifically, during procedure developement, it was not recognized that with a monitor in standby, no control room annunciation would occur if the in service monitor failed. The design was reviewed and found to be adequate.

Corrective actions for this event included: 1) deactivating the standby monitor, 2) initiating a temporary procedure change, 3) scheduling a permanent procedure revision.

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

A. REQUIREMENT FOR REPORT

This report is required per 10 CFR 50.73 (a)(2)(i), because a condition existed that was technically prohibited by the plant's Technical Specifications. Specifically, a channel functional test for the Recombiner Building Ventilation Radiation Noble Gas Monitor (EIIS Code IL) is required to demonstrate the operability of the logic channel. This included the trip function annunciation in main control room.

However, after channel functional testing, when the Recombiner Building Ventilation Radiation Noble Gas Monitor was returned to service, the operable monitor failed to meet the trip function annunciation in main control room for the inoperative or downscale function. This is a condition prohibited by the plant's Technical Specifications.

B. UNIT(s) STATUS AT TIME OF EVENT

1. Power Level/Operating Mode

Unit 1 was in startup operation at an approximate power level of 25 MWt (approximately one percent of rated thermal power). The reactor mode switch was in the start and hot standby position.

2. Inoperable Equipment

There was no inoperable equipment that contributed to this event.

C. DESCRIPTION OF EVENT

1. Event

On 5/25/88 at approximately 1630 CDT, Procedure Upgrade Program personnel (PUP) and Engineering Support (ES) personnel were investigating the logic operation of the Recombiner Building Ventilation Radiation Noble Gas Monitor. At that time, they determined that the system, as configured, did not provide adequate annunciation capability in the main control room.

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If more space is required, use additional NRC Form 366A's (17)

The Recombiner Building Ventilation Radiation Noble Gas Detection System consists of two separate monitors. The monitors, by procedure, were being maintained with one of the monitors in service while the other monitor was in a standby configuration. PUP and ES personnel determined that if the monitor that was in service were to fail due to an inoperable condition or a downscale reading on the monitor, there would be no annunciation in the control room.

The Recombiner Building Ventilation Radiation Noble Gas Monitor system is not designed to automatically activate the standby monitor when the operating monitor becomes inoperable or fails downscale.

When PUP and ES personnel determined that this condition existed, they initiated a deficiency card (1-88-2285), as required by the plant's administrative controls, and the standby monitor was deactivated at approximately 1645 CST. Personnel in the Nuclear Safety and Compliance (NSC) department evaluated the deficiency and initiated an investigation.

As part of the investigation, the Unit 1 Technical Specifications were reviewed. The surveillance requirements for the Recombiner Building Ventilation Radiation Noble Gas Monitor are contained in Technical Specifications Table 4.14.2-1, item 3.a. This table entry requires that channel functional tests be performed once every quarter. The channel functional test requires, in part, demonstrating that during the test, a main control room annunciation occurs if a circuit failure occurs (i.e., an inoperable condition) or the instrument indicates a downscale failure (i.e., a downscale condition).

The performance of plant procedure 62CI-CAL-010-0S (Recombiner Building Vent Radiation Monitor) was believed to satisfy the Technical Specifications requirements for a channel functional test. This conclusion was based on the fact that when each of the channels was removed from service and tested, a control room annunciation occurred.

However, after the channel functional testing, one of the two channels is returned to service and the other one of the two channels is placed in a standby configuration. In this configuration, the annunciation in the main control room will not occur if the channel that is in operate fails. As such, the channel that was returned to service was not really capable of completely meeting the Technical Specifications operability requirements.

2. Other Systems Affected

No systems, other than the Unit 1 Recombiner Building Ventilation Radiation Noble Gas Detection System, were affected by this event.

3. Method of Discovery

The event was discovered as a result of a PUP and ES personnel review of the Recombiner Building Ventilation Radiation Noble Gas Monitors logic.

The PUP efforts are long term corrective actions to detect errors in plant procedures and correct these deficiencies.

4. Operator Actions

Licensed plant operations personnel performed the following actions:

a. Processed the deficiency card.

b. Deactivated the Recombiner Building Ventilation Radiation Noble Gas Monitor that was in the standby condition. This would allow a control room annunciation to occur if the channel that was in service were to fail.

5. Auto/Manual Safety System Response

No safety systems actuated in this event, nor were any required to actuate.

D. CAUSE OF EVENT

1. Immediate Cause

The immediate cause of this event is the same as the root cause.

2. Root/Intermediate Cause

The root cause of this event was procedure inadequacy. Specifically, the surveillance procedure did not accurately reflect the possible logic channel configurations. Plant personnel who initially developed the surveillance procedure did not identify that one monitor in a standby configuration would prohibit the annunciation functions of the operable monitor.

As part of the investigation of this event, the design was reviewed. Based on the results of the review, it was concluded that the design, as currently installed, was adequate.

E. ANALYSIS OF EVENT

While the way the two channels were being operated did not fully ensure that the Recombiner Building Ventilation Radiation Noble Gas Monitor system was always capable of alarming in the main control room, there were other activities that provided reasonable assurance that the Technical Specifications requirements were met. Specifically, plant procedure 62EV-SAM-003-0S (Gaseous Waste Discharge Monitor Checks) is performed daily. This procedure requires plant personnel to perform a daily channel check by visually observing the radiation monitors.

The daily channel check provided reasonable assurance that if an inoperative or downscale condition existed on the operable monitor, the following would occur: 1) the inoperable monitor would be returned to an operable status, 2) the redundant monitor would be placed into an operable status, or 3) a noble gas sample would be taken immediately and daily thereafter. These actions would occur until at least one of the two monitors was operable. These actions would enable plant personnel to comply with the Technical Specifications requirements. Additionally, it should be noted that the high radiation annunciation function (an annunciation in the main control room that is required by the Technical Specifications) was still operable.

Based on the above information, it is concluded that this event had no adverse impact on nuclear safety. Since, this daily channel check is performed daily, this event would not be more severe at other power levels or any other operating mode.

F. CORRECTIVE ACTIONS

The corrective actions for this event included:

1. The redundant monitor was deactivated at approximately 1645 CST on 05/25/88. The deactivation of the redundant monitor ensured that control room annunciation would occur if the monitor that was in service failed.

2. Initiating temporary procedure changes to procedure 64CH-SAM-005-0S (Gaseous Effluent Sampling). The temporary changes ensure that the redundant monitor (the one that was in standby) is left in either a deactivated or fully operable condition at all times.

   As previously stated, with one monitor deactivated, a control room annunciation will occur if the in service monitor fails. In the condition where both monitors are fully operable, if one of the monitors fails, the minimum number of channels, as required by the Technical Specifications, will be satisfied. If both monitors fail, a main control room annunciation will occur.

3. Scheduling a permanent revision to plant procedure 64CH-SAM-005-0S. The revision will ensure that the redundant monitor is left in either a deactivated or fully operable condition at all times. It is currently anticipated that the procedure revision will be in place by approximately 11/30/88.

G. ADDITIONAL INFORMATION

1. FAILED COMPONENT(s) IDENTIFICATION

   No equipment failed in this event.

2. PREVIOUS SIMILAR EVENTS

   No previous similar events were noted.

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

PLANT HATCH - UNIT 1
NRC DOCKET 50-321
OPERATING LICENSE DPR-57
LICENSEE EVENT REPORT
DEFICIENT PROCEDURE ALLOWS CONFIGURATION
WHERE MONITORS DO NOT MEET OPERABILITY REQUIREMENT

Gentlemen:

In accordance with the requirements of 10 CFR 50.73(a)(2)(i), Georgia Power Company is submitting the enclosed Licensee Event Report (LER) concerning an event where a condition existed that was prohibited by the plant's Technical Specifications. This event occurred at Plant Hatch - Unit 1.

Sincerely,

W. G. Hairston, III
Senior Vice President

GEK/lg

Enclosure: LER 50-321/1988-010

c: (see next page)

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Georgia Power

c: Georgia Power Company
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Mr. L. T. Gucwa, Manager Nuclear Safety and Licensing
GO-NORMS

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