

NOTICE OF VIOLATION

Southern Nuclear Operating Company, Inc.
Hatch Units 1 and 2

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

During the NRC inspection conducted on May 18, 1997 through June 28, 1997, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG 1600, the violation is listed below:

Unit 1 and Unit 2 Technical Specification (TS) 5.4 required, in part, that written procedures shall be established, implemented, and maintained covering the activities in the applicable procedures recommended in Regulatory Guide (RG) 1.33, Revision (Rev.) 2, Appendix A, February 1978.

RG 1.33, Appendix A, Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors, paragraph 1, Administrative Procedures, part (c), recommends procedures for Equipment Control (e.g., locking and tagging), part (l), recommends procedures for plant fire protection program. Paragraph 9, "Procedure for performing maintenance," recommends procedures for performing maintenance and paragraph 7.e, "Procedures for control of Radioactivity," recommends radiation protection procedures for Radiation Work Permit System, for Contamination Control and for Bioassay Programs.

Administrative Control Procedure 30AC-OPS-001-0S, "Control of Equipment Clearance and Tags," Rev. 15, Step 8.4.5 required, in part, that the drafter of the clearance will determine the required isolation boundaries and fill out the equipment clearance sheet. Step 8.5.2 required, in part, that appropriate system drawings, electrical diagrams, load lists and system operating procedures will be used to determine the adequacy of the proposed clearance.

Surveillance Procedure 42SV-FPX-019-1S/2S, "Penetration Seal Surveillance," Rev. 2, for Unit 1 and Unit 2, Section 7.7 required, in part, that if any item in subsection 7.4 was marked "Reject" or any other degradations were noted, the 10% sample of the seals being surveyed was rejected, and a second 10% sample must be requested from fire protection engineering. The second sample will be inspected in accordance with the steps of this procedure.

Maintenance Procedure 50AC-MNT-001-0S, "Maintenance Program," Rev. 24, Step 4.2.19, required, in part, that part of the responsibilities to implement the Maintenance Program was to identify the requirements for Radiological Work Permits for authorized work.

Health Physics (HP) procedure 60AC-HPX-004-0S, "Radiation and Contamination Control," Rev. 14, specified that HP will initiate controls to ensure the spread of contamination is minimized; will perform non-routine radiation and contamination surveys as required, to support operation and maintenance; will perform airborne surveys during

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radioactive work which is expected to cause airborne radioactivity unless constant air monitors are provided; and will perform periodic air sampling to evaluate the effectiveness of filtered ventilation used to control airborne radioactivity.

Contrary to the above, written procedures were not implemented in that:

1. On June 9, 1997, steps 8.4.5 and 8.5.2 of Administrative Control Procedure 30AC-OPS-001-OS, Rev. 15, were not correctly implemented. A clearance drafter and two reviewers failed to identify an inadequate clearance boundary for the B loop of the Unit 1 Core Spray System.
2. On or before April 19, 1997, section 7.7 of procedure 42SV-FPX-019-1S/2S, Rev. 2, was not implemented. Subsection 7.4 of the procedure contained items marked "Reject" and additional degradations were documented and a second 10% sample of fire protection penetration seals was not requested from fire protection engineering and inspected as required.
3. On May 23, 1997, step 4.2.19 of procedure 50AC-MNT-001-OS, Rev. 24, was not fully implemented. Craftsman failed to identify the requirements of a radiological work permit for an assigned maintenance work activity. As a result, a significant personnel contamination occurred.
4. On June 26, 1997, during disassembly of a containment structure associated with Unit 1 condensate filter maintenance activities, workers did not follow contamination control guidance contained in procedure 60AC-HPX-004-OS, in that adequate surveys to identify the potential contamination hazards present were not conducted, engineering controls to minimize air flow from potentially contaminated to non-contaminated areas were not employed; and unapproved methods to compact contaminated materials within 55 gallon drums were used.

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

Pursuant to the provisions of 10 CFR 2.201, Southern Nuclear Operating Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, Hatch Nuclear Plant, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if

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the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Atlanta, Georgia
this 25 day of July 1997