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the southern electric system

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June 3, 1988

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

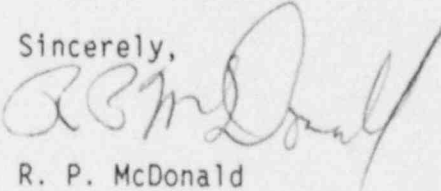
PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
RESPONSE TO INSPECTION REPORT 88-11

Gentlemen:

In response to your letter of May 16, 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 88-11. A copy of this response is being provided to NRC Region II for review. In the enclosure, 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

LGB/lg

Enclosure:

1. Violation 88-11-01 and GPC Response

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U. S. Nuclear Regulatory Commission
June 3, 1988
Page Two

c: Georgia Power Company
Mr. J. T. Beckham, Jr., Vice President - Plant Hatch
Mr. L. T. Gucwa, Manager Nuclear Safety and Licensing
GO-NORMS

U. S. Nuclear Regulatory Commission, Washington, D. C.
Mr. L. P. Crocker, Licensing Project Manager - Hatch

U. S. Nuclear Regulatory Commission, Region II
Dr. J. N. Grace, Regional Administrator
Mr. P. Holmes-Ray, Senior Resident Inspector - Hatch

ENCLOSURE

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
VIOLATION 88-11-01 AND GPC RESPONSE

VIOLATION 88-11-01

Criterion 57 of Appendix A of 10 CFR Part 50 requires that each line that penetrates primary reactor containment and is neither part of the reactor coolant pressure boundary nor connected directly to the containment atmosphere have at least one containment isolation valve which shall be either automatic, or locked closed, or capable of remote operation.

Contrary to the above, prior to February 1988, torus to drywell vacuum breaker test solenoid valves (T48-F342A-L) were incapable of holding pressure during required local leak rate testing due to design deficiencies. Therefore, these valves were incapable of performing a containment isolation function as required by Criterion 57 for a closed system.

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

RESPONSE TO VIOLATION 88-11-01

Admission or denial of violation:

The violation is admitted. The torus to drywell vacuum breaker test solenoid valves were incapable of holding pressure during required local leak rate testing. The event was reported by Georgia Power Company in Licensee Event Report (LER) 50-366/1988-007 dated February 12, 1988.

ENCLOSURE (Continued)

VIOLATION 88-11-01 AND GPC RESPONSE

Reason for the violation:

The violation was the result of a design error. Specifically, design Architect/Engineer (A/E) personnel from the Bechtel Eastern Power Corporation (BEPC), did not specify (on the installation drawings) the direction in which the test solenoid valves should be installed.

Consequently, field installation personnel, per standard practice, installed the valves in the direction of process (i.e., vacuum breaker test air) flow. This direction was exactly opposite to the direction required for primary containment isolation.

Corrective steps which have been taken and the results achieved:

As a result of this event, the following corrective actions were implemented:

1. Design Change Request (DCR) 88-31 was written and implemented to reverse the direction of Unit 2 vacuum breaker test solenoid valves 2T48-F342A through L.

This DCR was implemented on February 29, 1988, via Maintenance Work Order (MWO) 2-88-1091. Following completion of the work, the valves were functionally tested using the following plant procedures: 42IT-TET-001-0S, (Pressure Testing of Piping and Components), 34SV-T48-002-2S (Suppression Chamber to Drywell Vacuum Breaker System Operability), and 42SV-TET-001-2S (Primary Containment Periodic Type B and Type C Leakage Tests). These tests were completed satisfactorily on March 7, 1988. Applicable plant drawings were updated to indicate the new direction of the valves.

ENCLOSURE (Continued)

VIOLATION 88-11-01 AND GPC RESPONSE

2. On February 13, 1988, the three-way ASCO valves outboard of the Unit 1 vacuum breaker test solenoid valves 1T48-F342A through L, were removed per MWO 1-88-0606. The air lines were capped. The capping of the lines provided the required second isolation boundary for the air lines. (The pneumatic actuator is the first, or inboard, isolation boundary.)

On February 19, 1988, after further review by the solenoid valves' vendor, it was determined that the Unit 1 valves would remain closed when primary containment pressures (in the suppression pool area) approached approximately 35 psig. The peak torus pressure during the Design Basis Accident (DBA) Loss of Coolant Accident (LOCA) is 28 psig.

Based on this information, plant personnel concluded that the Unit 1 test solenoid valves would have remained closed during the DBA LOCA. As such, the pipe caps were redundant (since the Unit 1 valves would remain closed at pressures above the DBA LOCA suppression pool area pressure).

However, as a conservative action, plant personnel decided to leave the caps in place. The pipe caps will remain installed until the valves can be modified to withstand conservative suppression pool local leak rate test (LLRT) pressures (approximately 59 psig).

3. On February 24, 1988, GPC's A/E, Southern Company Services (SCS), completed a review of Plant Hatch's LLRT program. It was concluded ". . . that there are no additional Containment Isolation Valves that would be suspect in performing their containment isolation function following a LOCA event." This conclusion was transmitted to GPC by SCS letter number REA-8-2-139, dated February 24, 1988.

ENCLOSURE (Continued)

VIOLATION 88-11-01 AND GPC RESPONSE

4. In April of 1988, GPC's Corporate Quality Assurance (QA) department conducted an extensive audit of BEPC. The focus of this audit was in the area of design review. In addition, BEPC has conducted an internal investigation into this event and its causes.

As a result, BEPC has implemented corrective actions to strengthen its design control process. These corrective actions included:

- a. Strengthening administrative controls to include a formal design verification within each discipline.
- b. Proceduralizing the required coordination between each discipline.
- c. Requiring the performance of an integrated discipline design review, as required, for those designs requiring multi-discipline action.
- d. Training design personnel on the design verification methodology.
- e. Increasing management focus on design verification.

ENCLOSURE (Continued)

VIOLATION 88-11-01 AND GPC RESPONSE

Corrective steps which will be taken to avoid further violations:

DCR 88-30 has been issued to modify the Unit 1 vacuum breaker test solenoid valves (1T48-F342A through L). This modification will allow the valves to remain closed against the conservative LLRT pressure of approximately 59 psig. The modification will consist of replacing the existing valve springs with heavier springs. The replacement springs will be rated for pressures of approximately 65 psig.

Maintenance Work Order 1-88-2286 has been written to implement DCR 88-30. This MWO will be worked during the next scheduled Unit 1 refueling outage. This outage is currently scheduled to begin in the Fall of 1988.

Plant procedure 42SV-TET-001-1S (Primary Containment Periodic Type B and Type C Leakage Tests), will be revised. The revision will require that the solenoid valves be leak rate tested in the containment isolation direction. This revision will be effective prior to the procedure's use during the next scheduled Unit 1 refueling outage.

Date when full compliance will be achieved:

Full compliance was achieved for Unit 1 on February 13, 1988. This occurred when the air lines were capped.

Full compliance was achieved on Unit 2 on March 7, 1988. This occurred when the solenoid valves were reversed and satisfactorily functionally tested.