

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 August 17, 1997, through October 4, 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 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 2, Appendix A, February 1978.

Appendix A of RG 1.33, Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors, paragraph 9, Procedure for performing maintenance, part (e), recommends procedures for the control of maintenance, repair, replacement, and modification work.

Administrative Control procedure 50AC-MNT-001-0S, Maintenance Program, Revision 25, Step 4.2.5, requires, in part, that plant maintenance be performed and controlled within the boundaries of work instructions of Maintenance Work Orders. Step 8.2.2 and sub-step 8.2.1.2 require, in part, that non-safety and safety-related work instructions, block 23 of the Maintenance Work Order, state a specific scope of work using referenced material, as applicable. Step 8.5.1 require, in part, that prior to the start of plant maintenance, the responsible personnel will perform a cursory review of the Maintenance Work Order package to ensure that the contents are adequate.

Administrative Control Procedure 40AC-QCX-001-0S, Quality Control Inspection Program, Revision 7, Step 8.6.5, requires, in part, that the qualified Quality Control inspectors perform inspections in accordance with the approved Quality Control Inspection Point Assignment Sheet.

Administrative Control Procedure 10AC-MGR-019-0S, "Procedure Use and Adherence," Revision 0, Step 8.2.1, requires, in part, that "Continuous Use" of a procedure is required when work being performed could affect the operability of a safety system.

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

1. On August 15, 1997, Administrative Control procedure 50AC-MNT-001-0S, Maintenance Program, Revision 25, Steps 4.2.5, 8.2.2, 8.2.1.2, and 8.5.1 were not correctly performed. Unit 1 operations personnel developed a Maintenance Work Order and authorized maintenance work activities using a Maintenance Work Order with no work instructions, referenced material, or specific work scope identified. Maintenance work was completed using a Maintenance Work Order with inadequate instructions following a cursory review by responsible personnel.

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2. On or before March 28, Step 8.6.5 of procedure 40AC-QCX-001-05 was not fully implemented. A VT1 inspection for replacement work activities on Reactor Feedwater Inboard check valve 2B21-F010B was not performed as required by the Quality Control Inspection Point Assignment Sheet.
3. On September 11, 1997, Step 8.2.1 of procedure 111C-MGR-019-05 was not implemented. Operations personnel transferred Emergency Diesel Generator (FDG) 125 Volt Direct Current (VDC) battery chargers without the use of procedures. This resulted in improper battery charger alignment that rendered the 125 VDC subsystems for the 2A and 2C EDGs inoperable.

This is a Severity Level IV Violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Southern Nuclear Operating Company, Inc. 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 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 safeguarding 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 3rd day of November 1997

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