

Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-6526

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

W. G. Hairston, III
Senior Vice President
Nuclear Operations

the southern electric system

HL-100
0502I
X7GJ17-H120

October 11, 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 88-24

Gentlemen:

In response to your letter of September 22, 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 88-24. A copy of this response is being provided to NRC Region II for review. In the enclosures, 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,


W. G. Hairston, III

JJP/lg

Enclosures:

1. Violation 88-24-01 and GPC Response
2. Violation 88-24-02 and GPC Response

c: (see next page)

8810210568 881011
PDR ADOCK 05000321
Q PDC

IEO1
11

U. S. Nuclear Regulatory Commission
October 11, 1988
Page Two

c: Georgia Power Company
Mr. H. C. Nix, General Manager - Plant Hatch
Mr. L. T. Gucwa, Manager Licensing and Engineering
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. J. E. Menning, Senior Resident Inspector - Hatch

ENCLOSURE 1

PLANT HATCH - UNIT 2
NRC DOCKET 50-366
OPERATING LICENSES NPF-5
VIOLATION 88-24-01 AND GPC RESPONSE

VIOLATION 88-24-01

10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances.

Contrary to the above, an inadequate Electrohydraulic Control (EHC) system drawing resulted in an inappropriate equipment clearance which, in turn, resulted in inadvertent closing of the Unit 2 low pressure turbine intercept valves on August 9, 1988. Drawing H-21243 did not accurately reflect the as-built EHC pump discharge piping. This inadequate drawing was used in the preparation of equipment clearance 2-88-1336 and resulted in a clearance that was inappropriate for existing plant conditions. The intercept valves were inadvertently closed when the clearance was being placed on the EHC system.

This is a Severity Level IV violation (Supplement 1). (Unit 2 only)

RESPONSE TO VIOLATION 88-24-01

Admission or denial of violation:

The violation occurred as described in the Notice of Violation.

ENCLOSURE 1 (Continued)

VIOLATION 88-24-01 AND GPC RESPONSE

Reason for the violation:

The violation was caused by personnel error in that plant engineering personnel incorrectly revised a plant drawing which resulted in the inadvertent isolation of electrohydraulic control (EHC) fluid to the turbine valves during the performance of a clearance. Following implementation of Design Change Request (DCR) 83-175, plant drawing H-21243, "Turbine Generator Auxiliary Systems I. E. D.: Control Oil and Control Fluid," was updated via As-Built Notices (ABNs) 87-630, 88-377, and 88-392 to reflect the physical changes to the system. These ABNs were performed incorrectly in that they indicated valve 2N32-FV20 would not affect the flow of EHC fluid to any of the turbine valves when, in fact, closing the valve isolated EHC fluid to two of the four Turbine Combined Intercept Valves (CIVs).

On 08/09/88, plant Operations personnel used the improperly updated plant drawing to write clearance 2-88-1333 to replace EHC pump 2N32-C001B. The clearance required valve 2N32-FV20 to be closed. When the clearance was performed and valve 2N32-FV20 closed, EHC fluid to the CIVs was isolated.

Corrective steps which have been taken and the results achieved:

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

1. Plant drawing H-21234 was revised on 8/10/88 by ABN 88-505 to accurately reflect the physical arrangement of EHC hydraulic unit piping. The ABN clearly shows that closing valve 2N32-FV20 isolates EHC fluid to the turbine valves.

ENCLOSURE 1 (Continued)

VIOLATION 88-24-01 AND GPC RESPONSE

2. Plant personnel determined that the engineer who had made the error is no longer employed by Georgia Power Company (GPC). As such, there are no corrective actions that apply to this individual. However, GPC will implement corrective actions for engineers who are currently employed, as described in the section presenting corrective steps to avoid further violations.

Corrective steps which will be taken to avoid further violations:

As part of the investigation of this event, plant personnel reviewed the DCR package for Unit 1. (This DCR package installed a modification on Unit 1 that was similar to the modification installed on Unit 2.) During the review, they determined that there was no plant drawing (i.e., a drawing assigned a specific "H" drawing number) for the Unit 1 EHC System. A plant drawing is being created from the vendor's (General Electric) drawing and will correctly reflect the as built EHC system for Unit 1. (It should be noted that the vendor drawing was on site and was used by plant personnel.) The new drawing will be completed and issued by 1/20/89.

As previously stated, the engineer who committed the error is no longer employed by GPC. However, this event will be included in the fourth quarter's (1988) Engineering Continuing Training in order to emphasize the importance of completing accurate ABNs.

Date when full compliance will be achieved:

Full compliance was achieved on August 10, 1988 when the above corrective actions were implemented.

ENCLOSURE 2

PLANT HATCH - UNIT 1
NRC DOCKETS 50-321
OPERATING LICENSES DPR-57
VIOLATION 88-24-02 AND GPC RESPONSE

VIOLATION 88-24-02

Technical Specification 6.8.1.a requires that written procedures be established, implemented, and maintained for the applicable activities 1. Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, recommends procedures for operation of the turbine-generator system.

Procedure 34SO-N34-008-1N, "Turbine Generator Bearing Oil System", provides written instructions for operation of the Unit 1 turbine-generator bearing oil system.

Contrary to the above, procedure 34SO-N34-008-1N was inadequate in that it did not provide instructions for the swapping of lube oil coolers. On April 19, 1988, operations personnel performed the swapping operation without procedural guidance and inadvertently introduced air into the turbine lube oil system. This resulted in a turbine trip and automatic scram in Unit 1.

This is a Severity Level IV violation (Supplement 1). (Unit 1 only)

RESPONSE TO VIOLATION 88-24-02

Admission or denial of violation:

The violation occurred as stated in the Notice of Violation.

ENCLOSURE 2 (Continued)

VIOLATION 88-24-02 AND GPC RESPONSE

Reason for the violation:

The violation was caused by an inadequate procedure in that procedure 34SO-N34-008-1N, "Turbine Generator Bearing Oil System," did not include detailed steps for removing from service the operating lubrication oil cooler and starting the standby lubrication oil cooler. A contributing cause was personnel error by plant Operations personnel in that the shift supervisor assigned a Plant Equipment Operator (PEO) to perform the exchange of the turbine lubrication oil coolers without verifying the PEO had sufficient experience to perform this task. Furthermore, the PEO failed to inform the shift supervisor he was unfamiliar with the task.

Corrective steps which have been taken and the results achieved:

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

1. The involved operations personnel were counseled relative to this event and its consequences.
2. Procedures 34SO-N34-008-1N and 34SO-N34-008-2N, "Turbine Generator Bearing Oil System," were revised to include the detailed steps necessary for removing from service the operating lubrication oil cooler and starting the standby lubrication oil cooler. These revisions were effective 5/11/88 and 5/13/88, respectively.

Corrective steps which will be taken to avoid further violations:

Corrective actions were taken, as described above, which should preclude recurrence of the cited events. No further corrective actions are anticipated at this time.

ENCLOSURE 2 (Continued)

VIOLATION 88-24-02 AND GPC RESPONSE

Date when full compliance will be achieved:

Full compliance was achieved on May 13, 1988 when the above corrective actions were implemented.