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JUL 29 1986

Georgia Power Company
✓ATTN: Mr. J. H. Miller, Jr.
President
P. O. Box 4545
Atlanta, GA 30302

Gentlemen:

SUBJECT: REPORT NOS. 50-321/86-11 AND 50-366/86-11

Thank you for your response of May 30, 1986, to our Notice of Violation issued on April 30, 1986, concerning activities conducted at your Hatch facility.

After careful consideration of the bases for your denial of the violation, we agree with your analysis that there was not a violation relative to performance of pressure tests since the tests were not required by previous Codes and were performed prior to the end of the recent maintenance/refueling outage for the particular unit, thereby meeting the 1980 Edition of the ASME Section XI Code. However, for reasons presented in the enclosure to this letter, we still consider that a violation existed relative to not having procedures for scheduling the required tests. We have concluded that the Severity Level should be decreased from Severity Level IV to Severity Level V. In accordance with 10 CFR 2.201(a), please submit to this office within 30 days of the date of this letter a written statement describing steps which have been taken to correct the violation and the results achieved, corrective steps which will be taken to avoid further violations, and the date when full compliance will be achieved.

The response directed by this letter is not subject to the clearance procedures of the Office of Management and Budget issued under the Paperwork Reduction Act of 1980, PL 96-511.

We appreciate your cooperation in this matter.

Sincerely,

ISI
J. Nelson Grace
Regional Administrator

Enclosure:
Staff Assessment of Licensee
Response

cc w/encl: (See page 2)

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JUL 29 1986

Georgia Power Company

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cc w/encl:

✓ J. P. O'Reilly, Senior Vice President,
Nuclear Operations
✓ J. T. Beckham, Vice President and
General Manager-Nuclear Operation
✓ H. C. Nix, Site General Manager
✓ A. Fraser, Acting Site QA Supervisor
✓ L. Gucwa, Manager, Nuclear Safety
and Licensing

bcc w/encl:

✓ NRC Resident Inspector
✓ Hugh S. Jordan, Executive Secretary
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ENCLOSURE

STAFF ASSESSMENT OF LICENSEE RESPONSE

Region II has reviewed the licensee's response of May 30, 1986, to the Notice of Violation issued April 30, 1986. After a careful review of the Georgia Power Company response, the staff has found the licensee's response to part of the violation (relative to the performance of required pressure tests) to be acceptable, but part of the response (relative to the requirement for procedures for scheduling pressure tests) to be unacceptable.

The licensee's letter of response states, "no specific regulatory requirement exists for implementing procedures for scheduling and tracking of surveillance items, such as pressure tests." Contrary to this statement, Hatch Units 1 and 2 Technical Specification (TS) 6.8.1 requires that "written procedures shall be established, implemented, and maintained covering the activities referenced below." Paragraph c. of TS 6.8.1, as referenced in the Notice of Violation, requires procedures for "Surveillance and test activities of safety-related equipment." To further define what procedures are required, paragraph a. of TS 6.8.1 requires, "The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978." Paragraph 1.f. of Regulatory Guide 1.33 recommends Administrative Procedures for, "Schedule for Surveillance Test and Calibration." Therefore, specific regulatory requirements do exist for implementing procedures for scheduling and tracking surveillance items such as pressure tests.

Based on the above discussion, the violation remains for not having implementing procedures for scheduling pressure tests. Since it appears that all required tests were performed as required by code, the Violation is changed from Severity Level IV to Severity Level V.