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JAN 12 1987

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

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NOS. 50-321/86-28, 50-321/86-33, 50-366/86-28,
AND 50-366/86-33

Thank you for your response of December 12, 1986, to our Notice of Violation issued on November 7, 1986, concerning activities conducted at your Hatch facility under NRC License Nos. DPR-57 and NPF-5. We are evaluating your response and would like more information concerning activities at Hatch.

In your response to Violations A and B, you state that the events "had no actual or potential safety consequences." We believe your position is not correct since the violations do involve potential safety consequences. The Unit 1 and Unit 2 Technical Specifications (TS) basis states that the TS requirements in this area ensure "the calculated doses would be less than the allowable levels stated in Criterion 19 of the General Design Criteria for Nuclear Power Plants, Appendix A to 10 CFR Part 50." Criterion 19 requires that a control room shall be provided from which actions can be taken to maintain the reactor in a safe condition under accident conditions and adequate radiation protection shall be provided to permit access and occupancy of the control room under accident conditions. Failing to verify the operability of the main control room ventilation system in accordance with the TS as described in Violations A and B does involve potential safety consequences since actions to mitigate the effects of an accident may be impaired due to a lack of control room habitability.

Violation A Response

In your response to Violation A, you imply the system was found to be satisfactory when the surveillance test was performed on September 26, 1986. We believe the actual as-found system flow was out of specification and had to be adjusted to be within the TS limits.

Also in your response to Violation A, you do not address the basic problem of not providing adequate detail in your procedure to ensure compliance with TS requirements. This problem was also evident in the Unit 1 Emergency Diesel Generator (EDG) day tank (volume) conversion problem discussed in Inspection Report 86-33.

Inspection Report 86-33 requested that you discuss the cause and corrective actions relating to the Unit 1 EDG day tank (volume) conversion problem. Your response addressed the immediate corrective actions but did not provide any explanations as to the cause of the problem. The corrective actions did not

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address the more basic problem of inadequate procedures and failure to follow procedures. For example, how has this procedure been performed in the past since personnel could not verify the day tank level using the guage, and what actions will be taken to minimize these types of procedural deficiencies in other instructions?

Violation B Response

In your response to Violation B, you state that personnel error contributed to the violation and surveillance "due dates" were incorrectly assigned based upon the operating cycle completion date. We would like more detail on the nature of the personnel error and on any procedures you may have to provide guidance in scheduling surveillances which were in existence at that time or are in place at this time.

You stated that I&C personnel documented satisfactory performance of the surveillance test on December 6, 1985. At the time of the inspection, this documentation was not available. The resident inspectors will verify the documentation you state exists in the follow-up of this violation.

Also in your response to Violation B, you discuss how frequency "changes" are independently verified since the strengthening of the program in May 1985. You also state that since the surveillance test in question has been performed within the required frequency since the changes in 1985, these previous changes will preclude this occurrence. It is not clear to us that the missed surveillances addressed in Violation B occurred due to frequency "changes." In your description of the reason for Violation B, you assign personnel error and Unit 1/Unit 2 TS differences, but no mention is made of problems due to frequency changes. It does not appear that the changes made in May 1985 constituted corrective steps for Violation B.

Also under corrective steps taken, you state you now schedule surveillance due dates based upon the previous "due" date of the surveillance and not "solely" upon the operating cycle completion date. This implies that you still use the operating cycle completion dates in some way to arrive at the surveillance due dates and we would like more information on how the due date is scheduled. Also, it appears that scheduling a surveillance due date based on the previous due date may lead to further violations of the specified frequencies. If a surveillance test is performed earlier than the due date and the next test is scheduled based on the due date instead of the actual performance date, then the required frequency will be exceeded if the 125 percent allowable interval is used. It appears that it would be more appropriate to schedule the next surveillance test based on the actual performance date.

Under corrective steps which will be taken to prevent recurrence, you state "No further corrective steps are necessary beyond the performance of the procedure at its next due date in order to be in compliance with the 3.25 times 18-month surveillance interval." This addresses the next surveillance but does not ensure future tests will be scheduled within the TS required 3.25 times the specified interval for this or other surveillance tests.

In summary, we would like additional information in the following areas.

1. What is the justification for considering the violations to have no potential safety consequences?

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2. Was the as-found flowrate on September 26, 1986, outside the TS required flowrate?
3. Will your Procedure Upgrade Program (PUP) or other programs ensure that procedures can be performed to meet TS requirements and contain adequate detail to prevent occurrences like Violation A and the EDG day tank level problem?
4. What was the cause of the EDG day tank level problem (i.e., had the gauge been replaced recently, procedure changed, etc.)?
5. How has this procedure been performed in the past, since personnel could not verify the day tank level using the gauge?
6. Have there been and are there any procedures which provide guidance in scheduling surveillances?
7. What are the details of personnel error involved with Violation A?
8. How does the May 1985 change to the Technical Specification surveillance scheduling program revision process constitute a corrective step for Violation B (i.e., was this violation due to a frequency change)?
9. Are surveillance due dates scheduled using operating cycle completion dates? If so, what means are in place for not exceeding the TS required frequency?
10. How will you prevent exceeding the TS required frequency using previous due dates vice actual completion dates to schedule the next surveillance tests?
11. How will you prevent exceeding the 3.25 times the surveillance interval for future surveillance tests in general?

Please provide the above information within 30 days of receipt of this letter.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter will be placed in the NRC Public Document Room.

The responses directed by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this letter, please contact us.

Sincerely,
Original signed by/
J. Nelson Grace

J. Nelson Grace
Regional Administrator

cc: (See page 4)

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cc: J. P. O'Reilly, Senior Vice President

- ✓ Nuclear Operations
- ✓ J. T. Beckham, Vice President, Plant Hatch
- ✓ H. C. Nix, Site Operations General Manager
- ✓ A. Fraser, Acting Site QA Supervisor
- ✓ L. Gucwa, Manager, Nuclear Safety and Licensing

bcc ✓ NRC Resident Inspector
 ✓ Hugh S. Jordan, Executive Secretary
 Document Control Desk
 State of Georgia

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