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August 22, 1997

Docket Nos. 50-321
50-366

HL-5469

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

Edwin I. Hatch Nuclear Plant
Reply to a Notice of Violation

Gentlemen:

In response to your letter dated July 25, 1997, and according to the requirements of 10 CFR 2.201, Southern Nuclear Operating Company (SNC) is providing the enclosed response to the Notice of Violation associated with Inspection Report 97-05. In the enclosure, a transcription of the NRC violation precedes the SNC response.

Sincerely,

A handwritten signature in cursive script that reads "Lewis Sumner".

H. L. Sumner, Jr.

DLM/eb

Enclosure: Violation 97-05-01 and SNC Response

cc: Southern Nuclear Operating Company
Mr. P. H. Wells, Nuclear Plant General Manager
NORMS

U. S. Nuclear Regulatory Commission, Washington, D. C.
Mr. N. B. Le, Project Manager - Hatch

U. S. Nuclear Regulatory Commission, Region II
Mr. L. A. Reyes, Regional Administrator
Mr. B. L. Holbrook, Senior Resident Inspector - Hatch

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Enclosure

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Violation 97-05-01 and SNC Response

VIOLATION 97-05-01

Unit 1 and Unit 2 Technical Specification (TS) 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 (Rev.) 2, Appendix A, February 1978.

RG 1.33, Appendix A, Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors, paragraph 1, Administrative Procedures, part (c), recommends procedures for Equipment Control (e.g., locking and tagging), part (l), recommends procedures for plant fire protection program. Paragraph 9, "Procedure for performing maintenance," recommends procedures for performing maintenance and paragraph 7.e. "Procedures for control of Radioactivity," recommends radiation protection procedures for Radiation Work Permit System, for Contamination Control and for Bioassay Programs.

Administrative Control Procedure 30AC-OPS-001-0S, "Control of Equipment Clearance and Tags," Rev. 15, Step 8.4.5 required, in part, that the drafter of the clearance will determine the required isolation boundaries and fill out the equipment clearance sheet. Step 8.5.2 required, in part, that appropriate system drawings, electrical diagrams, load lists and system operating procedures will be used to determine the adequacy of the proposed clearance.

Surveillance Procedure 42SV-FPX-019-1S/2S, "Penetration Seal Surveillance," Rev. 2, for Unit 1 and Unit 2, Section 7.7 required, in part, that if any item in subsection 7.4 was marked "Reject" or any other degradations were noted, the 10% sample of the seals being surveyed was rejected, and a second 10% sample must be requested from fire protection engineering. The second sample will be inspected in accordance with the steps of this procedure.

Maintenance Procedure 50AC-MNT-001-0S, "Maintenance Program," Rev. 24, Step 4.2.19, required, in part, that part of the responsibilities to implement the Maintenance Program was to identify the requirements for Radiological Work Permits for authorized work.

Health Physics (HP) procedure 60AC-HPX-004-0S, "Radiation and Contamination Control," Rev. 14, specified that HP will initiate controls to ensure the spread of contamination is minimized; will perform non-routine radiation and contamination

Enclosure
Violation 97-05-01 and SNC Response

surveys as required, to support operation and maintenance; will perform airborne surveys during radioactive work which is expected to cause airborne radioactivity unless constant air monitors are provided; and will perform periodic air sampling to evaluate the effectiveness of filtered ventilation used to control airborne radioactivity.

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

1. On June 9, 1997, steps 8.4.5 and 8.5.2 of Administrative Control Procedure 30AC-OPS-001-0S, Rev. 15, were not correctly implemented. A clearance drafter and two reviewers failed to identify an inadequate clearance boundary for the B loop of the Unit 1 Core Spray System.
2. On or before April 19, 1997, section 7.7 of procedure 42SV-FPX-019-1S/2S, Rev. 2, was not implemented. Subsection 7.4 of the procedure contained items marked "Reject" and additional degradations were documented and a second 10% sample of fire protection penetration seals was not requested from fire protection engineering and inspected as required.
3. On May 23, 1997, step 4.2.19 of procedure 50AC-MNT-001-0S, Rev. 24, was not fully implemented. Craftsman failed to identify the requirements of a radiological work permit for an assigned maintenance work activity. As a result, a significant personnel contamination occurred.
4. On June 26, 1997, during disassembly of a containment structure associated with Unit 1 condensate filter maintenance activities, workers did not follow contamination control guidance contained in procedure 60AC-HPX-004-0S, in that adequate surveys to identify the potential contamination hazards present were not conducted, engineering controls to minimize air flow from potentially contaminated to non-contaminated areas were not employed; and unapproved methods to compact contaminated materials within 55 gallon drums were used.

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

RESPONSE TO VIOLATION 97-05-01

Reason for the violation:

The first example in the Notice of Violation was caused by personnel error. The clearance drafter, reviewer, and authorizer failed to take into account the fact the inservice jockey pump suction source was from the 1B core spray subsystem. As a result of this oversight, a clearance was written, reviewed, and approved that did not require the jockey pump suction source to be realigned. Consequently, the 1B core spray subsystem

Enclosure
Violation 97-05-01 and SNC Response

suction valve was closed isolating the jockey pump suction source and resulting in receipt of the core spray jockey pump system low water level alarm.

Contributing to this oversight was an inadequate core spray piping and instrumentation drawing. The drawing did not clearly indicate the suction path for the jockey pumps. This made it more likely that personnel could overlook the fact that the jockey pump suction source is from the core spray subsystems.

The second example in the Notice of Violation was caused by an inadequate procedure. Procedures 42SV-FPX-019-1S, "Penetration Seal Surveillance," and 42SV-FPX-019-2S, "Penetration Seal Surveillance," implement the inspection requirements of the Fire Hazards Analysis and are not clear in specifying the criteria for expanding the inspection scope. The intent of step 7.7 of the procedures is to require an inspection of an additional sample only after a fire protection engineering evaluation of items marked as "reject" by the field inspector indicates the condition is rejectable per criteria in section 2.1.1.c of Appendix B of the Fire Hazards Analysis. These criteria are "apparent changes in appearance" or "abnormal degradations." This interpretation of the intent of step 7.7 is consistent with the note which appears in the visual inspection criteria portion of the surveillance procedures. The note states that items marked "reject" will require further evaluation.

Other problems, such as documentation discrepancies, may cause a field inspector to mark a penetration seal as rejected. These types of problems do not require an additional ten percent sample of penetration seals to be inspected. Per the aforementioned note, upon further evaluation by fire protection personnel, these problems would have been determined not to represent actual rejectable conditions. Although the wording of step 7.7 appeared to require additional inspections for any item marked "reject," fire protection personnel understood the intent of step 7.7 and the requirements of section 2.1.1.c of Appendix B of the Fire Hazards Analysis. Therefore, they did not initiate additional inspections when items marked "reject" were not actual rejectable conditions.

The third example in the Notice of Violation was caused by personnel error. Performance Team personnel failed to notify Health Physics personnel upon discovery of unanticipated wet conditions in the work area. As a result, the anti-contamination clothing worn and the radiation work permit used by the worker were not adequate for the work performed or the conditions encountered and therefore did not prevent personnel from becoming contaminated. Contributing to this event was less than adequate communication between Performance Team and Health Physics personnel regarding the anticipated scope of work activities. Specifically, Performance Team personnel failed to explain, and Health Physics personnel failed to ascertain, the type and extent of work to be performed.

Enclosure
Violation 97-05-01 and SNC Response

The fourth example in the Notice of Violation was caused by personnel error. Performance Team personnel failed to adequately communicate regarding the work to be performed. Specifically, Health Physics personnel were not made aware the containment structure used during recently completed Unit 1 condensate filter maintenance activities was to be disassembled. However, Performance Team personnel understood they had permission to disassemble and dispose of the structure. As a result of the inadequate communication, Performance Team personnel disassembled the structure without proper Health Physics supervision and control to prevent the spread of contamination during the disassembly and disposal processes.

Corrective steps which have been taken and the results achieved:

As a result of these events, the following corrective actions were taken:

1. The individuals who drafted, reviewed, and approved the clearance have been counseled. Additionally, Operations personnel have been made aware of the event described in the first example of the Notice of Violation, its causes, and its consequences through beginning-of-shift training sessions. Clearance drafting and reviewing practices have been discussed with Operations personnel, as well.
2. Performance Team personnel involved with the event described in the third example in the Notice of Violation have been counseled regarding their inappropriate actions.
3. Health Physics and Performance Team personnel were made aware of the event described in the third example, its causes, and its consequences. The importance of proper communication and a questioning attitude and how inadequate communication contributed to this event were stressed.
4. A multi-discipline Problem Solving Team was formed to investigate the contamination events described in the Notice of Violation and recent similar events. Root causes and contributing factors for these events were identified by the team and recommendations to address those causes and factors were presented to and approved by management. Implementation of these recommendations is being tracked via the plant action item tracking system as required by administrative control procedure 10AC-MGR-004-0S, "Deficiency Control System."

Corrective steps which will be taken to avoid further violations:

The Unit 1 and Unit 2 core spray piping and instrumentation drawings will be revised by September 29, 1997, to clarify the interface between the jockey pump and core spray systems.

Enclosure
Violation 97-05-01 and SNC Response

Procedures 42SV-FPX-019-1S and 42SV-FPX-019-2S will be revised prior to their next scheduled performance to clarify the requirements of step 7.7. The wording of the step will be changed to make clear its original intent to require additional inspections only if the condition of a penetration seal meets the criteria of "apparent changes in appearance" or "abnormal degradations" given in Appendix B of the Fire Hazards Analysis.

Date when full compliance will be achieved:

For the first example, full compliance was achieved on June 9, 1997 when the standby jockey pump was started, manually clearing the low water level alarm.

For the second example, Plant Hatch is in compliance with the intent of the requirement of step 7.7 of procedures 42SV-FPX-019-1S and 42SV-FPX-019-2S. The procedures will be revised prior to the next scheduled performance, June 6, 1998, to clarify the intent of the step. Plant Hatch will be in full compliance by June 6, 1998 when the procedure revisions are implemented.

For the third and fourth examples, Plant Hatch presently is in full compliance with procedural requirements covering radiation worker practices, contamination control, and radiation work permit usage.