

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 February 8, 1998 through March 21, 1998, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG 1600, the violations are listed below:

- A. Unit 2 Technical Specification 5.4.1.a requires that written procedures be established, implemented, and maintained covering activities delineated in Appendix A of Regulatory Guide (RG) 1.33, Revision (Rev.) 2. RG 1.33, Appendix A, "Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors," paragraph 9 requires, in part, maintenance procedures.

Procedure 50AC-MNT-001-OS, Revision 25, stated, in part, that personnel were responsible to ensure that plant maintenance is performed and controlled within the boundaries of "Work Instructions" and/or procedures. The procedure also required, in part, that personnel performing work shall not exceed the scope of work as authorized in the work instructions and work requested document. In addition, the procedure required that personnel performing the work were to verify clearance boundaries.

Contrary to the above, on March 5, 1998, maintenance personnel did not follow procedures and conducted work that was not specified on a maintenance work order which was outside the approved personnel protection clearance boundary. As a result, the work rendered both trains of the Unit 2 Standby Liquid Control System inoperable.

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

- B. Unit 2 Technical Specification 5.4.1.a requires that written procedures be established, implemented, and maintained covering activities delineated in Appendix A of RG 1.33, Rev. 2. RG 1.33, Appendix A, "Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors," paragraph 8 (2) requires, in part, test procedures.

Procedure 42IT-TET-004-OS, Operating Pressure Testing of Piping and Components, Rev. 5, stated, in part, that the responsible engineer will indicate if test results are acceptable, based on no evidence of leakage from welds, pipes, or components bodies. A VT-2 inspector may sign for the responsible engineer when verbal concurrence is given by the responsible engineer for pressure tests which contain neither valve manipulations nor leakage.

Enclosure 1

Contrary to the above, on March 5, 1998, during work on the Unit 2 Standby Liquid Control System, procedures were not followed, in that a VT-2 inspector signed for post-maintenance component inspection test results for the responsible engineer without obtaining review or verbal concurrence from the responsible engineer.

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

- C. Title 10 CFR 20.1501 requires, in part, each licensee to make surveys that are necessary for the licensee to comply with the regulations in this part; and are reasonable under the circumstances to evaluate the extent of radiation levels and the potential radiological hazards that may be present.

Contrary to the above, on October 7, 1997, and January 13, February 10, and March 10, 1998, the licensee failed to conduct adequate surveys to evaluate the extent of radiation levels and potential hazards to workers conducting Condensate Pump vibration analysis measurements within a high radiation area on the Unit 1 (U1) Turbine Building 112 foot elevation.

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

- D. Technical Specification 5.4.1.a requires that written procedures be established, implemented, and maintained covering activities delineated in Appendix A of RG 1.33, Rev. 2. RG 1.33, Appendix A, "Typical Procedures for Pressurized Water Reactor and Boiling Water Reactors," paragraph 7.e, requires, in part, radiation protection procedures for access control to radiation areas, including a Radiation Work Permit (RWP) system.

Procedure 60AC-HPX-004-0S, Radiation and Contamination Control, Rev. 15, effective August 29, 1997, requires, in part, plant personnel to comply with all radiation protection postings, rules, regulations and procedures; to notify Health Physics (HP) technicians prior to the start of work authorized in any Radiation Work Permit (RWP); and to read and to comply with the requirements of the RWP whenever their duties require such authorization. For jobs within a High Radiation Area, HP personnel were required to perform pre-job surveys or enter the area with the workcrew to perform surveys while the job was worked, to document the survey data, and to adjust RWP requirements, if necessary.

Radiation Work Permit 98-0003, Rev. 0, starting January 1, 1998, required, in part, workers to notify HP of work scope prior to the start of the job and HP to determine or verify radiation conditions for each specific work location.

Contrary to the above, written procedures were not followed in that, on March 10, 1998, an Engineering/Maintenance worker failed to follow procedures in that he signed into the Radiologically Controlled Area on RWP No. 98-0003, Rev. 1, and conducted vibration analysis measurements on the Unit 1 Condensate Pump equipment located in a posted High Radiation Area on the Turbine Building 112 foot elevation without notifying HP personnel of the work scope prior to the start of the job.

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

- E. Technical Specification 5.4.1.a requires that written procedures be established, implemented, and maintained covering activities delineated in Appendix A of RG 1.33, Rev. 2. RG 1.33, Appendix A, "Typical Procedures for Pressurized Water Reactor and Boiling Water Reactors," paragraph 8.b requires procedures for surveillance testing.

Procedure 64CI-OCB-005-0S, Fission Product Monitors, Rev. 2, ED 1, Subsection 7.20, Inoperable monitoring System(s), provided the required actions to complete the sampling and analysis for particulates, iodine, and noble gas when certain parts of the system were inoperable.

Contrary to the above, written procedures were not followed in that, on February 8, 1998, chemistry personnel failed to follow procedures to analyze a grab sample of primary containment atmosphere for particulates, iodine, and noble gas when the Fission Product Monitoring System was inoperable. As a result, a 12-hour time requirement for sample analysis was not met.

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

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.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

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 safeguards 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 21st day of April 1998