



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
101 MARIETTA STREET, N.W.  
ATLANTA, GEORGIA 30323

Report Nos.: 50-321/89-14 and 50-366/89-14

Licensee: Georgia Power Company  
P. O. Box 1295  
Birmingham, AL 35201

Docket Nos.: 50-321 and 50-366

License Nos.: DPR-57 and NPF-5

Facility Name: Hatch 1 and 2

Inspection Conducted: July 17-20, 1989

Inspector:

J. L. Coley

8-3-89

Date Signed

Approved by:

J. J. Blake, Chief

8/3/89

Date Signed

Materials and Processes Section  
Engineering Branch  
Division of Reactor Safety

SUMMARY

Scope:

This routine, announced inspection was conducted in the area of followup on licensee actions on previous inspection findings (92701 and 92702) Units 1 and 2.

Results:

Licensee actions with regard to resolution and closure of NRC issues addressed in this report were satisfactory.

In the areas inspected, violations or deviations were not identified.

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## REPORT DETAILS

### 1. Persons Contacted

#### Licensee Employees

- \*T. Moore, Assistant General Manager, Plant Support
- \*S. Tipps, Nuclear Safety and Compliance Manager
- J. Payne, Compliance Engineer

Other licensee employees contacted during this inspection included engineers, security force members, technicians, and administrative personnel.

#### NRC Resident Inspector

- \*R. A. Musser, Resident Inspector

\*Attended exit interview

### 2. Action on Previous Inspection Findings (92701 and 92702) Units 1 and 2

- a. (Closed) Inspector Followup Item 50-321,366/89-02-05, "Inspection of RHR Hanger Weld Removal"

This item dealt with an inspector's finding that the licensee had in error removed Hanger Lug Weld 1E11-HFW-059 of Maintenance Work Order (MWO) 1-88-5022 from the ASME Section XI, Repair and Replacement (R/R) Program. The inspector was concerned that examination requirements in ASME Section XI, Article IWD-4000, for the area of the pipe where metal has been removed would be more stringent than the requirements required by the construction code. The licensee's review of this item revealed that the R/R engineer was in error when he removed this weld from the ASME R/R program. However, the licensee's R/R Program Procedure 42EN-ENG-014-05 which invokes the repair requirements of Article IWD-4000 also invokes Article IWA-4000 which allows repairs to be performed in accordance with the Owner's Design Specification and the Construction Code of the Component or System. The Design Specification (Hatch Document A-11000) and the Construction Code (USASB31.1.0) for this noncritical, RHR service water pipe, required that visual inspection of the ground area be performed. The licensee had performed a visual inspection of the hanger lug removal area on November 14, 1988, in accordance with MWO 1-88-5022. The licensee actions in this instance met ASME Section XI minimum code requirements.

- b. (Closed) Inspector Followup Item 321,366/89-02-04, "Programmatic Link Between Maintenance Procedures and Section XI Requirements"

During a NRC Maintenance Team Inspection, a need was identified for additional procedural requirements to ensure proper coordination and testing for ASME Section XI Components in the maintenance program. For instance, Procedure 50AC-MNT-001-OS which established the requirements and responsibilities for the control of maintenance activities at Plant Hatch, did not clearly specify that for a Section XI Component, Section XI programs are to be referred to for determining post-maintenance testing requirements. This omission was of concern due to the potential differences in post-maintenance tests (functional test) required for Section XI components versus balance of plant components. In addition, Preventive Maintenance Procedure 53PM-MON-001-OS which is intended to apply to preventive maintenance only (not to interface with any Technical Specification requirement) and is used to obtain and analyze vibration analysis data for the purpose of detecting incipient failure of equipment stated that: "when actual vibration levels exceed pre-identified suggested maximum recommended levels, this does not necessarily mean that the associated equipment is inoperable, instead the information is intended for use as a diagnostic tool to indicate the need to perform additional testing, schedule future maintenance or do other analysis of equipment condition."

The above was a concern since there was a potential that the referenced vibration analysis could apply to a Section XI pump. In that case, if the vibration results exceed the requirements of ASME, Section XI, Subsection IWP, Table IWP-3100-2 of Section XI must take precedence and proper actions taken to satisfy Section XI requirements.

The licensee has revised Procedure 53PM-MON-001-OS Rev. 1, paragraph 4.3.3, to state: "In cases where a spectrum is obtained due to a suspected problem with a pump covered by ASME Section XI, the vibration shall be compared to the ASME Section XI Criteria. Applicable corrective action will be in accordance with 31GO-INS-001-OS (IST Pump and Valve Operability Tests)."

Procedure 50AC-MNT-001-OS Rev. 10, paragraph 3.2.5 also has been revised to include reference to the functional test guideline procedure. The functional test guideline procedure references ASME Section XI and requires the inservice test plan to be used in assigning function test (Step 7.4). Step 8.5.9 was also added to 50AC-MNT-001-OS to address this item.

The licensee's corrective actions are now complete and adequate.

- c. (Closed) Inspector Followup Item 321,366/86-11-03, "Review of Procedures Addressing ASME Section XI VT Requirements"

During investigation of this finding, an inspector discovered that the licensee's site QA had an open audit finding (85-ISI-2/165) identifying the fact that certain plant procedures did not address VT-1, VT-2, VT-3 and VT-4 visual examination requirements of ASME Section XI. Pending review of the QA audit finding corrective action, the inspector opened this item to verify the licensee's corrective actions would be satisfactory.

During this inspection the inspector reviewed procedures listed below to ensure adequate corrective action had been performed by the licensee.

<u>Document No. Reviewed</u>	<u>Title</u>
10AC-MGR-007-0S Rev. 1	Personnel Qualification Requirements
45QC-INS-010-0S Rev. 0	Visual, VT 1
45QC-INS-011-0S Rev. 0	Visual, VT-2
45QC-INS-012-0S Rev. 1	Visual, VT 3 and 4
42IT-TET-006-2S Rev. 0	ISI Pressure Test of Class 1 Systems
42IT-TET-001-0S Rev. 2	Pressure Testing of Piping and Components
42IT-TET-003-0S Rev. 1	Hydrostatic Testing of Piping and Components
42IT-TET-004-0S Rev. 1	Operating Pressure Testing of Piping and Components
42IT-TET-005-0S Rev. 0	Pneumatic Pressure Testing of Piping and Components

The licensee's actions regarding the site QA audit finding was satisfactory and this item is considered closed.

- d. (Closed) Unresolved Item 50-321/87-10-01, "Adequate Corrective Action Relative to Welder Qualification Discrepancies"

The weld (FW-3) involved in this finding and inadequate welding training was identified as examples of discrepancies listed in a subsequent NRC violation 50-321,366/88-31-01, "Failure to Adequately Control Special Processes for Welding and Nondestructive Testing" (paragraph g.). This unresolved item will be closed and the licensee corrective actions will be audited during the 1990 outage for Unit 1 when the licensee will perform supplemental radiography on Weld FW-3.

- e. (Closed) Inspector Followup Item 321,366/88-38-03, "Review of Work Packages for Mark I Containment Long Term Program"

An inspector requested that the licensee provide the work packages of modifications performed on the Mark I Containment such as the T-Quencher, Tie-down, Mid-bay Column and Catwalk Platform. The

licensee could not provide the above packages within the inspection time limitations because it required significant time for the licensee to accumulate the data.

The licensee presently has on file a list of applicable Design Change Requests and their appropriate microfilm locations. The Maintenance Work Orders can be obtained from the Design Change Request. The licensee will hold these references for the inspectors review and this item is considered closed.

- f. (Closed) Inspector Followup Item 321,366/87-15-03, "Documentation Availability for Inspection Review at Site Within Minimum Inspection Time Period"

The information requested by the inspector is now available in Compliance for review. The licensee stated in the exit that they would assist the inspector to obtain the information requested in as timely a manner as possible. However, when significant information is needed from vendors a lag time of two weeks is needed in order that the vendor can perform procedural and administrative reviews and approvals required as part of the turnover process. Therefore, prior notification is requested when the magnitude of the request is significant.

- g. (Open) Violation 50-321,366/88-31-01, "Failure to Adequately Control Special Processes for Welding and Nondestructive Testing." Licensee's corrective action was not examined this inspection since this item remains open. However, during discussions with the licensee concerning the closure of Unresolved Item: 50-321/87-10-01, listed above (paragraph d.), the licensee stated that 50-321/88-31-01 could not be closed until the spring outage of Unit 1 (April 1990) when radiographs could be performed on Weld FW-3. The licensee has stated in their reply to 50-321,366/88-31-01 that all corrective action would be completed in September 1989. A new completion date will be required for Unit 1.

Within the areas examined, violations or deviations were not identified.

### 3. Exit Interview

The inspection scope and results were summarized on July 20, 1989, with those persons indicated in paragraph 1. The inspector described the areas inspected and discussed in detail the inspection results listed above. Proprietary information is not contained in this report. Dissenting comments were not received from the licensee.