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Georgia Power
the southern electric system

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Docket No. 50-366 HL-3469

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

Edwin I. Hatch Nuclear Plant - Unit 2
Reply to a Notice of Violation

Gentlemen:

In response to your letter dated August 30, 1993 and in accordance with the requirements of 10 CFR 2.201, Georgia Power Company (GPC) is providing the enclosed response to the Notice of Violation associated with Inspection Report 93-13. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Sincerely,

J. T. Beckham, Jr.

JKB/cr

Enclosure: Violation 93-13-01 and GPC Response

cc: *Georgia Power Company*
Mr. H. L. Sumner, General Manager - Nuclear Plant
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. K. Jabbour, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebneter, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

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Enclosure

Edwin I. Hatch Nuclear Plant - Unit 2
Violation 93-13-01 and GPC Response

Violation 93-13-01

Hatch Unit 2 Technical Specification 6.8.1.a requires that written procedures be established, and maintained as recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.

Section 9 of Regulatory Guide 1.33 recommends procedures for maintenance activities. Implicit in these requirements is that the procedures are adequate.

Contrary to the above, there was inadequate procedural guidance for maintenance activities on two Unit 2 Primary Containment Isolation Valves, 2B31-F019 and 2B31-F020. There were no specific written instructions or guidance explaining how the maintenance activities should be conducted or that the valve actuator should be adjusted following maintenance activities. Also, there was no procedural guidance delineating valve actuator adjustment acceptance criteria to ensure the valves would close as required. As a result, the valve actuators were not properly adjusted to ensure valve closure for all reactor pressure conditions.

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

RESPONSE TO VIOLATION 93-13-01

Admission or denial of the violation:

The event occurred as described in the Notice of Violation.

Reason for the violation:

This violation was caused by less than adequate procedural controls. Specifically, a procedure did not exist to set-up the type of actuator used on valves 2B31-F019 and 2B31-F020. Maintenance activities previously performed on valves 2B31-F019 and 2B31-F020 during the fall 1992 refueling outage used procedure 52CM-MME-011-OS, Gate and Globe Valve Repair. However, this procedure was developed as a generic procedure and did not provide specific setup requirements for these valves. Consequently, the valve actuators were not adjusted to close against full reactor pressure, as required by their reactor coolant pressure boundary isolation design function, following maintenance activities in October 1992.

Corrective steps which have been taken and the results achieved:

As a result of this event, the following corrective actions were taken:

1. Valves 2B31-F019 and 2B31-F020 were declared inoperable on 7/21/93, and as a conservative measure, valve 2B31-F020 was deactivated and secured in the closed position by use of a gagging device.

2. A review of other reactor coolant pressure boundary isolation valves was performed. Only two other isolation valves with the same type of actuators as valves 2B31-F019 and 2B31-F020 were found. These were Unit 1 valves 1B31-F019 and 1B31-F020. As a conservative measure, these valves were declared inoperable, and valve 1B31-F020 was deactivated and secured in the closed position by use of a gagging device.

3. Procedure 52CM-MME-035-OS, "Fisher Diaphragm Actuator Type 667," has been developed for setting up actuators of the make and model used on isolation valves 1B31-F019, 1B31-F020, 2B31-F019, and 2B31-F020. The procedure has been approved for validation as part of the normal procedure validation process per administrative control procedure 10AC-MGR-003-OS, "Preparation and Control of Procedures." The procedure will be used to correct the set-up of the actuators for valves 2B31-F019 and 2B31-F020 during the next outage of sufficient duration. The procedure will be issued effective following its validation and the incorporation of any changes found necessary.

   Valves 1B31-F019 and 1B31-F020 were closed as a conservative action. Prior to returning them to service, a leakage test will be performed to ensure each valve is capable of closing against full reactor pressure. This will require opening one valve at a time in order to check the leakage past the closed valve. Should one or both valves fail the leakage test, the valves will be closed, and valve 1B31-F020 will be deactivated and re-gagged as required by the Unit 1 Technical Specifications. If necessary, their actuator set-up will then be corrected using procedure 52CM-MME-035-OS during the next outage of sufficient duration.

Corrective steps which will be taken to avoid further violations:

No further corrective actions are necessary.

Date when full compliance will be achieved:

Full compliance was achieved at 2035 CDT on July 21, 1993 when valve 2B31-F020 was declared inoperable, deactivated, and secured in the closed position by use of a gagging device as required by the Unit 2 Technical Specifications.