Georgia Power Company
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 877-7279

J. T. Beckham, Jr.
Vice President - Nuclear
Hatch Project

Georgia Power
the southern electric system

September 29, 1993

Docket Nos. 50-321
50-366

HL-3468

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 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 93-14. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Sincerely,

J. T. Beckham, Jr.

JKB/cr

Enclosures:
1. Violation 93-14-01 and GPC Response
2. Violation 93-14-02 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

IE01
1/1

Enclosure 1

Edwin I. Hatch Nuclear Plant
Violation 93-14-01 and GPC Response

VIOLATION 93-14-01

10 CFR Part 50, Appendix B, Criterion XI states in part that, "a test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. ... Test results shall be documented and evaluated to assure that test requirements have been satisfied."

Hatch Administrative Control Procedure 50AC-MNT-008-0S, "Motor Operated Valve Maintenance and Testing," in Section 8.3.4.1 requires that "dynamic testing confirm (sic) that the MOV [motor-operated valve] can perform its design basis functions." In Section 8.3.4.3.1, the procedure requires that, "for dynamic tests performed at less than design basis flow/pressure, an evaluation of the MOV's performance at design basis flow/pressure (projected) ... be made." In Section 8.6.1.1, the procedure requires that "test data and evaluation results ... be forwarded to offsite support for reconciliation with MOV design calculations, as needed."

Contrary to the above, as of July 30, 1993, dynamic tests of MOVs within the scope of Generic Letter 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance," were performed in accordance with test procedures that did not incorporate the requirements and acceptance limits for determining operability prior to returning the tested MOVs back (sic) to service, and the test results for these MOVs were not evaluated and documented adequately at the time of this inspection. As a result, the operability determinations for these MOVs remained undocumented.

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

RESPONSE TO VIOLATION 93-14-01

Admission or denial of the violation:

The violation occurred as described in the Notice of Violation.

Reason for the violation:

This violation was caused by inadequate procedures. Plant administrative control procedure 50AC-MNT-008-0S, "Motor Operated Valve Maintenance and Testing," required that an evaluation of valve performance be performed at projected design basis conditions for those valves whose dynamic tests were conducted at less than design basis conditions. However, implementing procedure 53IT-TET-002-0S, "Valve Operation Test and Evaluation System (VOTES)," did not require the results of tests conducted at less than design basis conditions to be evaluated further as required by administrative control procedure 50AC-MNT-008-0S. Additionally, procedure 50AC-MNT-008-0S did not specify a time frame in which an evaluation was to be completed.

These procedures indicate that site personnel recognized the need to perform additional evaluation of dynamic test data; however, the method for extrapolation of test results to full design basis conditions was not defined, nor communicated, to site personnel. Site procedures did contain requirements and acceptance limits obtained from applicable design documents, but the acceptance limits were inadequate. As a result, a definitive determination of valve operability was not performed and documented.

Corrective steps which have been taken and the results achieved:

A review of dynamic motor operated valve test results is in progress. Most of the tests were conducted at or near design basis conditions; therefore, no further evaluation of these test results is required. However, approximately eight tests were conducted at less than design basis conditions; consequently, the test results for these valves have been evaluated at projected design basis conditions as required by procedure 50AC-MNT-008-0S. Valve performance at projected design basis conditions was found to be acceptable in all cases.

Corrective steps which will be taken to avoid further violations:

1. Future dynamic motor operated valve test results will be evaluated by qualified personnel to determine valve operability prior to returning the tested valve to service. The necessary information will be provided to qualified personnel to allow them to:

   A. Determine if the test was performed at design basis conditions.

   B. Evaluate the test results at projected design basis conditions for those tests not performed at these conditions.

C. Determine valve operability prior to returning the tested valve to service.

2. Acceptance criteria for future tests conducted under static conditions will be updated, as necessary, following the evaluation of dynamic test results and prior to performing the next static test.

Plant or design organization procedures, including procedures 50AC-MNT-008-0S and 53IT-TET-002-0S, will be revised or written, as necessary, to incorporate the preceding requirements. Information required to complete these tasks will be included in the procedures, or other controlled documents, or will be required to be collected as part of the dynamic test data. Procedures will be revised and written, as necessary, and approved for validation prior to the next scheduled refueling outage for the applicable unit.

Date when full compliance will be achieved:

Full compliance was achieved on September 23, 1993 when the evaluation at projected design basis conditions of dynamic tests not performed at design basis conditions was completed.

Enclosure 2

Edwin I. Hatch Nuclear Plant
Violation 93-14-02 and GPC Response

VIOLATION 93-14-02

10 CFR Part 50, Appendix B, Criterion XVI states, in part, that "measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected."

Contrary to the above, corrective action was not taken in March 1990 to raise the torque switch setting of the Residual Heat Removal (RHR) Torus Spray Train A Outboard MOV 1E11-F028A in response to the results of a dynamic test of similar valve RHR Torus Spray Train B Outboard MOV 1E11-F028B. Further, an evaluation of the operability of MOV 1E11-F028A and the applicable technical specification and reporting requirements, was not performed when dynamic testing of this MOV in October 1991 demonstrated that it might have been inoperable as set before initiation of the test.

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

RESPONSE TO VIOLATION 93-14-02

Admission or denial of the violation:

The violation occurred as described in the Notice of Violation in that operability and reportability reviews of valve 1E11-F028A were not performed in October 1991 following testing of the valve. It should be noted that it was a static test which was performed in October 1991, not a dynamic test as stated in the violation. It was the results of this static test, indicating the valve's torque switch setting was too low, which should have prompted operability and reportability reviews of the as-found condition.

Reason for the violation:

The violation was caused by an apparent misinterpretation of the requirements of Generic Letter 89-10 and an incorrect decision by personnel performing the static test of valve 1E11-F028A in October 1991. Personnel incorrectly thought that Generic Letter 89-10 did not require torque switch setting deficiencies found during baseline tests to be

evaluated and reported, as necessary. They also incorrectly decided that the October 1991 test was a baseline test due to perceived problems with the original static test of valve 1E11-F028A, performed by different personnel in March 1990, which they thought invalidated it as a baseline test. Because personnel believed the October 1991 test to be a baseline test, no Deficiency Card was written, per their interpretation of Generic Letter 89-10, when the test results indicated the valve's torque switch setting had to be raised from 2 to 3. As a result of the test, the torque switch setting was raised from 2 to 3 in October 1991. Since a Deficiency Card was not written, operability and reportability reviews of the as-found torque switch setting, which would have been initiated by the Deficiency Card per plant administrative control procedure 10AC-MGR-004-0S, "Deficiency Control System," were not performed.

Corrective steps which have been taken and the results achieved:

Operability and reportability reviews of the as-found condition of valve 1E11-F028A have been completed. At a torque switch setting of 2, it was determined the valve would have reached approximately 90 percent of full closure. At 90 percent closed, about 50 gallons per minute, or 0.3 percent of rated Low Pressure Coolant Injection system flow, would have been diverted from injecting into the reactor vessel. A review of in-service testing data revealed that this amount of diverted flow would not have prevented the Low Pressure Coolant Injection system from reaching its design rated reactor vessel injection flow rate. Therefore, it was concluded that both the Low Pressure Coolant Injection system and valve 1E11-F028A were capable of performing their intended safety functions and, hence, were operable, and that no reportable condition existed.

Site valve testing personnel have been instructed by their supervision to initiate a Deficiency Card on any torque switch setting changes found necessary as a result of testing, as well as any abnormalities found during the test, regardless of whether or not the test is a baseline test.

Corrective steps which will be taken to avoid further violations:

Procedure 50AC-MNT-008-0S will be revised and approved for validation prior to the next motor operated valve testing to incorporate the aforementioned direction to initiate deficiency card changes made as a result of testing regardless of whether or not the valve test is a baseline test.

Date when full compliance will be achieved:

Full compliance was achieved on September 23, 1993 when the operability and reportability reviews of the October 1991 as-found condition of valve 1E11-F028A were completed.