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the southern electric system

W. G. Hairston, III
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HL-1278
001031

September 12, 1990

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

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
RESPONSE TO INSPECTION REPORT 90-15

Gentlemen:

In response to your letter of August 24, 1990 and in accordance with the provisions of 10 CFR 2.201, Georgia Power Company (GPC) is providing the enclosed response to the Notice of Violation Associated with NRC Inspection Report 90-15. A copy of this response is being provided to NRC Region II for review. In the enclosure, a transcription of the NRC Violation precedes GPC's response.

Sincerely,


W. G. Hairston, III

JKB/eb

Enclosure: Violation 90-15-01 and GPC Response

c: (See next page.)

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c: Georgia Power Company
Mr. H. L. Sumner, General Manager - Nuclear Plant
Mr. J. D. Heidt, Manager Engineering and Licensing - Hatch
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U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. F. Rinaldi, Acting Licensing Project Manager - Hatch

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

ENCLOSURE 1

PLANT HATCH - UNIT 1
NRC DOCKET 50-321
OPERATING LICENSE DPR-57
VIOLATION 90-15-01 AND GPC RESPONSE

VIOLATION 90-15-01

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

Section 4 of Appendix "A" of Regulatory Guide 1.33 recommends procedures for the operation of the Emergency Core Cooling Systems. The Core Spray system is an Emergency Core Cooling System at Plant Hatch.

Procedure 34S0-E21-001-1S, Rev. 8, "Core Spray System," provides written instructions for the operation of the Unit 1 Core Spray System and specifies that valves 1E21-F025B and 1E21-F027B be maintained in the closed position and that valve 1E21-F3011A be maintained in the open position when the system is in its standby mode.

Contrary to the above, between July 23-25, 1990, valves 1E21-F025B and 1E21-F027B were found in the open position and valve 1E21-F3011A was found in the closed position. At the time of these findings, Unit 1 was operating at approximately 100 percent of rated power and the Core Spray system was in its normal standby mode.

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

RESPONSE TO VIOLATION 90-15-01

Admission or denial of violation:

The violation occurred as described in the Notice of Violation.

ENCLOSURE 1 (Continued)

VIOLATION 90-15-01 AND GPC RESPONSE

Reason for the violation:

The first event, in which valves 1E21-F025B and 1E21-F027B were found mispositioned, was caused by a less than adequate procedure. The Core Spray System had been aligned to the Condensate Transfer System, the alternate keep-fill system, per plant procedure 34SO-E21-001-1S, "Core Spray System," on 5/14/90. This was done because both Jockey Pumps, the primary keep-fill system, had been taken out of service on Clearance 1-90-1261. When the Core Spray System was aligned to the Condensate Transfer System, valves 1E21-F025B and 1E21-F027B were opened as required by the procedure.

Jockey Pump 1E21-C002B was returned to service on 5/21/90. As part of the return-to-service activities, an operability test was performed on the Jockey Pump. This was done per the "Jockey Pump Startup" section of procedure 34SO-E21-001-1S. This section of the procedure does not require valves 1E21-F025B and 1E21-F027B to be verified to be closed. Consequently, the procedure was not adequate to ensure valves 1E21-F025B and 1E21-F027B were returned to their proper position when transferring from the alternate keep-fill system to the primary keep-fill system.

The second event, in which valve 1E21-F3011A was found mispositioned, was caused by personnel error. Instrument and Control (I&C) technicians who performed procedure 57SV-E21-001-1S, "Core Spray Discharge Line Level Instrument FT&C," on 7/9/90 failed to follow procedural requirements regarding the positioning, independent verification, and sealing in position of valve 1E21-F3011A. The first I&C technician failed to follow procedural requirements in that he failed to open the valve as required by procedure 57SV-E21-001-1S and he sealed it in position contrary to the requirements of procedure 51GM-SPR-001-0N, "Sealing of Instrument Valves." The second I&C technician failed to follow procedural requirements in that he failed to verify independently the valve was in the open position as required by procedure 57SV-E21-001-1S and he failed to seal it in the open position as required by procedure 51GM-SPR-001-0N.

ENCLOSURE 1 (Continued)

VIOLATION 90-15-01 AND GPC RESPONSE

Corrective steps which have been taken and the results achieved:

As a result of these events, the following actions have been taken:

1. Upon discovery, the mispositioned valves were placed in their correct positions. Valves 1E21-F025B and 1E21-F027B were closed on 7/24/90 and valve 1E21-F3011A was opened on 7/25/90.
2. Procedure 34S0-E21-001-1S was marked-up to include the necessary steps in the "Jockey Pump Startup" section to ensure valves 1E21-F025A and B and 1E21-F027A and B are closed. The procedure revision currently is in the review and approval process and will be issued effective by 9/28/90. (The designs of the Unit 1 and Unit 2 Core Spray Systems are different in that the Unit 2 Core Spray System does not have an alternate keep-fill system; therefore, procedure 34S0-E21-001-2S, "Core Spray System," does not need to be revised.)
3. The two I&C technicians were disciplined per GPC's Positive Discipline Program.

Corrective steps which will be taken to avoid further violations:

No further corrective actions are necessary to prevent recurrence.

Date when full compliance will be achieved:

For the first event, full compliance was achieved on 7/24/90 when valves 1E21-F025B and 1E21-F027B were moved to the correct (closed) position. For the second event, full compliance was achieved on 7/25/90 when valve 1E21-F3011A was moved to the correct (open) position.