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J. T. Beckham, Jr.
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July 8, 1994

Docket No. 50-366

HL-4637

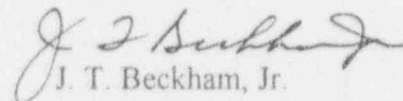
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

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

Gentlemen:

In response to your letter dated June 10, 1994, and according to 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 94-11. In the enclosure, a transcription of the NRC violation precedes GPC's response.

Sincerely,


J. T. Beckham, Jr.

JKB/jp

Enclosure: Violation 94-11-01 and GPC Response

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

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

U. S. Nuclear Regulatory Commission, Washington, D. C.
Mr. S. D. Ebnetter, Regional Administrator
Mr. B. L. Holbrook, Senior Resident Inspector - Hatch

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Enclosure

Edwin i. Hatch Nuclear Plant
Violation 94-11-01 and GPC Response

VIOLATION 94-11-01

Criterion V of Appendix B of 10 CFR 50 requires that activities shall be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings.

Drawing 542612: Target Rock Safety Relief Valves, prescribe [sic] the insulation installation requirements for these valves.

Southern Company Services drawing S-34325B: Isometric Instruments Yarway Columns, prescribes the insulation requirements for the steam line to the reactor vessel water level instrument leg condensing chamber.

Contrary to the above, on April 20, 1994, activities were not accomplished in accordance with instructions and drawings in that, the insulation on the safety relief valves and the steam line to the reactor vessel water level instrument condensing chamber was not installed as prescribed by Drawing 542612 and S-34325B, respectively. The safety relief valve insulation had been installed during the present outage. The water level instrumentation line had not been properly insulated for at least several years.

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

RESPONSE TO VIOLATION 94-11-01

Admission or denial of the violation:

The violation occurred as described in the Notice of Violation.

Reason for the violation:

The cause of the improperly installed insulation on the safety relief valves was less than adequate work instructions. Neither the Maintenance Work Order under which the safety relief valves were installed following removal for routine (each refueling outage) inspection and testing nor the plant procedure used to remove and install the insulation

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contained sufficient instructions to ensure the insulation was placed on the valves as shown on the drawing in the vendor manual.

Normally, exact placement of insulation on plant components is not crucial; therefore, the general instructions in plant procedure 52GM-MNT-018-0S, "Removal, Storage and Installation of Reflective Insulation," are adequate to ensure insulation is installed properly. However, in the case of the safety relief valves, it is important to ensure that certain portions of the valves are not covered by insulation so as to prevent possible subcomponent damage from heat entrapment. Neither the Maintenance Work Order nor the installation procedure for insulation cautioned workers against insulating certain portions of the safety relief valves. Consequently, workers, in an attempt to more securely fasten the insulation to the valves, covered a small portion of the valves that, per the design drawing, should not have been insulated.

The cause of the lack of insulation on the water level instrument steam lines could not be determined conclusively. Photographs dated May 1983 appear to show no insulation on the steam lines. However, no records of insulation removal were found; therefore, it could not be determined precisely when the insulation was removed, why it was removed, or why it was not installed.

Corrective steps which have been taken and the results achieved:

The insulation on the safety relief valves was installed according to its design drawing on 4/21/94 under Maintenance Work Order 2-93-5003.

Repetitive tasks have been created which will result in separate Maintenance Work Orders being generated to remove and reinstall insulation on the Unit 1 and Unit 2 safety relief valves when the valves are removed for inspection and testing during each refueling outage. The Maintenance Work Orders generated from these repetitive tasks will contain specific work instructions that will require verification that the insulation on the safety relief valves has been installed per the applicable design drawing.

The insulation on the water level instrument steam lines was installed according to its design drawings on 4/21/94 under Maintenance Work Order 2-93-5003.

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Corrective steps which will be taken to avoid further violations:

Plant procedure 52GM-MNT-018-0S will be revised to reference the applicable design drawing to be used when insulation is installed on the Unit 1 and Unit 2 safety relief valves. This revision will be effective before the next refueling outage (scheduled to begin 9/21/94).

The corresponding Unit 1 water level instrument steam lines will be inspected during the next scheduled Unit 1 Refueling Outage to ensure that they are properly insulated. Actions will be taken if necessary to ensure the lines are insulated as required by the applicable design drawings.

Date when full compliance will be achieved:

Full compliance was achieved on 4/21/94 when insulation was installed on the water level instrument steam lines and the safety relief valves as required by design drawings.