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

Report Nos.: 50-321/85-09 and 50-366/85-09

Licensee: Georgia Power Company
P. O. Box 4545
Atlanta, GA 30302

Docket Nos.: 50-321 and 50-366 License Nos.: DPR-57 and NPF-5

Facility Name: Hatch 1 and 2

Inspection Conducted: February 23 - March 24, 1985

Inspectors: Peter Holmes-Ray 4/18/85
Peter Holmes-Ray, Senior Resident Inspector Date Signed

RE Carroll for 4/18/85
Charles Brooks, Resident Inspector, Browns Ferry Date Signed

Approved by: V. W. Panciera 4/18/85
V. W. Panciera, Chief, Project Section 2B Date Signed
Division of Reactor Projects

SUMMARY

Scope: This inspection involved 144 inspector-hours on site in the areas of Technical Specification compliance, operator performance, overall plant operations, quality assurance practices, station and corporate management practices, corrective and preventive maintenance activities, site security procedures, radiation control activities, and surveillance activities.

Results: Of the areas inspected, 3 violations were identified; (failure to establish procedures as required per Technical Specification 6.8.1.c, paragraph 7; failure to correct Reactor Vessel Temperature and Pressure Curves for fluence, paragraph 7; and failure to implement and maintain procedures, paragraph 9).

REPORT DETAILS

1. Persons Contacted

   Licensee Employees

   *H. C. Nix, Site General Manager
   T. Greene, Deputy Site General Manager
   *J. A. Betsill, Operations Manager (Acting)
   *T. Seitz, Maintenance Manager
   C. T. Jones, Engineering Manager
   R. W. Zavadoski, Health Physics and Chemistry Manager
   *P. E. Fornel, Site O. A. Manager
   S. B. Tipps, Superintendent of Regulatory Compliance

   Other licensee employees contacted included technicians, operators, mechanics, security force members and office personnel.

   *Attended exit interview

2. Exit Interview

   The inspection scope and findings were summarized on March 1 and March 21, 1985, with those persons indicated in paragraph 1 above. The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspectors during this inspection.

3. Licensee Action on Previous Enforcement Matters

   This subject was not addressed in the inspection.

4. Unresolved Items

   Unresolved Items were not identified during this inspection.

5. Plant Tours (Units 1 and 2)

   The inspectors conducted plant tours periodically during the inspection interval to verify that monitoring equipment was recording as required, equipment was properly tagged, operations personnel were aware of plant conditions, and plant housekeeping efforts were adequate. The inspectors also determined that appropriate radiation controls were properly established, critical clean areas were being controlled in accordance with procedures, excess equipment or material was stored properly and combustible material and debris were disposed of expeditiously. During tours the inspectors looked for the existence of unusual fluid leaks, piping vibra-

tions, pipe hangers and seismic restraint settings, various valve and breaker positions, equipment caution and danger tags, component positions, adequacy of fire fighting equipment, and instrument calibration dates. Some tours were conducted on backshifts.

The inspectors routinely conducted partial walkdowns of emergency core cooling systems (ECCS). Valve and breakers/switch lineups and equipment conditions are randomly verified both locally and in the control room. During the inspection period, the inspectors conducted a complete walkdown in the accessible areas of the Unit 1 Standby Liquid Control System to verify that the lineups were in accordance with licensee requirements for operability and equipment material conditions were satisfactory.

Within the areas inspected, no violations or deviations were identified.

6. Plant Operations Review (Units 1 and 2)

The inspectors periodically during the inspection interval reviewed shift logs and operations records, including data sheets, instrument traces, and records of equipment malfunctions. This review included control room logs and auxiliary logs, operating orders, standing orders, jumper logs and equipment tagout records. The inspectors routinely observed operator alertness and demeanor during plant tours. During normal events, operator performance and response actions were observed and evaluated. The inspectors conducted random off-hours inspection during the reporting interval to assure that operations and security remained at an acceptable level. Shift turnovers were observed to verify that they were conducted in accordance with approved licensee procedures.

Within the areas inspected, no violations or deviations were identified.

7. Technical Specification Compliance (Units 1 and 2)

During this reporting interval, the inspectors verified compliance with selected limiting conditions for operations (LCOs) and results of selected surveillance tests. These verifications were accomplished by direct observation of monitoring instrumentation, valve positions, switch positions, and review of completed logs and records. The licensee's compliance with selected LCO action statements were reviewed on selected occurrences as they happened.

Surveillance Procedures and Records

a. The inspector conducted an annual review of the surveillance of safety-related systems and components to verify that surveillances are conducted in accordance with procedures which are technically adequate and properly approved and that the surveillances are performed within the required intervals as defined in Technical Specifications. The following discrepancies were found during this review:

(1) Table 4.2.11 of the Unit 1 Technical Specifications requires a calibration of the Safety Relief Valve (SRV) Secondary Position Indicator Recorder every 18 months. HNP-1-3820 "SRV Position Primary and Secondary Indicators Functional Test and Calibration" is intended to cover this requirement and Section H references HPN-1-5260 for the detailed recorder calibration procedure. HNP-1-5260 "L&N Speedomax W Calibration" does not include calibration data for the SRV recorder. A licensee representative stated that a revision to HNP-1-3820 is in progress to correct this deficiency.

(2) Unit 1 Technical Specification 4.9.A.2.d requires sampling diesel fuel for viscosity, water and sediment every 92 days. HNP-7611 "Oil Sampling Program" is intended to cover this requirement. HNP-7611 references HNP-7032 for the detailed water and sediment test procedure, however no procedure is referenced for the detailed viscosity testing and no procedure is contained in HNP-7611. A licensee representative stated that HNP-7080 "Viscosity of Diesel Fuel Oil" is used to determine the viscosity and acknowledged that this procedure should be explicitly referenced in HNP-7611.

(3) Unit 1 Technical Specification 4.6.D and 4.6.E require various reactor coolant system temperatures be compared and permanently recorded prior to recirculation pump starts. No procedure could be found which explicitly requires permanent recording of the temperatures prior to pump starts and no permanent record of these temperatures could be found for several recirculation pump starts conducted on Unit 1, February 22, 1985 (records having a 5-year retention period could, however, be found).

(4) Unit 1 Technical Specification 4.6.A and Unit 2 Technical Specification 4.4.6.1.1. require that reactor coolant system temperature and pressure be verified to be within limits every 30 minutes during heatups and cooldowns. No procedure could be found which requires that these checks be performed during reactor plant normal startups and no record could be found indicating that these checks were performed during a plant heatup conducted on Unit 1, February 19, 1985.

(5) Unit 2 Technical Specification 4.4.6.1.2 requires that reactor coolant system temperature and pressure be determined to be to the right of the criticality limit of Figure 3.4.6.1-2 within 15 minutes prior to withdrawal of control rods to bring the reactor critical. Although HNP-2-1001 Step C.14 requires shell temperature to be greater than 140°F (the limit from Figure 3.4.6.1-2) the procedure does not place a 15 minute restriction on this check and as a result, this temperature was checked a full 30-minutes prior to rod withdrawal in Unit 2, December 27, 1984.

The last 3 discrepancies (items 3, 4 and 5) shall be identified as a violation of Technical Specifications 6.8.1.c, failure to establish written procedures for surveillance requirements (321, 366/85-09-01).

b. Unit 1 Technical Specification 3.6.B establishes the pressure/temperature limits for hydrostatic tests of the reactor vessel, for non-nuclear heatup and cooldown and for critical operations. This is done by reference to curves 3.6-2, 3.6-3 and 3.6-4. These curves are to be corrected (temperature shifted) for neutron bombardment of the beltline region of the reactor vessel by curve 3.6-1. Initially, the feedwater nozzle curves are more limiting but with time at power the reactor vessel beltline curve becomes the most limiting. No procedure was in place to use or correct these curves. The licensee performed the necessary calculations and determined that the reactor vessel beltline curve was indeed the limiting curve. The inspector reviewed the last four reactor startups and found that no violation of the curve had occurred. The failure to have a procedure implemented which provided instruction to use the curves per Technical Specification 3.6.B and the failure to correct these curves for fluence is a violation (321/85-09-02).

8. Physical Protection (Units 1 and 2)

The inspectors verified by observation and interviews during the reporting interval that measures taken to assure the physical protection of the facility met current requirements. Areas inspected included the organization of the security force, the establishment and maintenance of gates, doors and isolation zones in the proper condition, that access control and badging was proper, and procedures were followed.

Within the areas inspected, no violations or deviations were identified.

9. Review of Nonroutine Events Reported by the Licensee (Units 1 and 2)

The following Licensee Event Reports (LERs) were reviewed for potential generic impact, to detect trends, and to determine whether corrective actions appeared appropriate. Events which were reported immediately were also reviewed as they occurred to determine that Technical Specifications were being met and that the public health and safety were of utmost consideration. The following LERs are considered closed:

Unit 1: 85-09*, 85-14*, 85-07*

Unit 2: 85-06*

*In-depth review performed.

The review of LERs Unit 1, 85-09 and 85-14 and Unit 2, 85-06 showed that Technical Specifications were violated in each of these with the some root cause - personnel error.

In 321/85-09, an operations person hanging clearance tags on the wrong Traveling Incore Probe (TIP) switches disabled primary containment isolation capability for the TIP ball valves. The clearance was properly made out so the error was in the hanging of the tags not the making out of the clearance.

In 321/85-14, the cause of this event is personnel error. The surveillance computer tracking sheet (shows the dates between which the procedure must be performed) had been signed off indicating that this procedure had been performed. Thus, I&C personnel thought the procedure had been performed since the sign off section of the tracking sheet was completed. However, the person who signed off the procedure on the tracking sheet realized that he had inadvertently signed off the wrong procedure, and he put a single line thru the completion date for PMP-1-3417. This line was meant to denote that the procedure had not been performed; however, the line was very fine in comparison to the size of the sign off. Therefore, the line was overlooked, and other I&C personnel were not aware that the procedure had not been performed until February 4, 1985, one week later.

In 366/85-06, an engineering error in the application of head correction to differential pressure transmitters resulted in the RCIC steam line isolation set point was not in accordance with Technical Specifications.

These three examples of personnel error resulting in nonconformance with Technical Specifications are listed as a violation (321, 366/85-09-03).