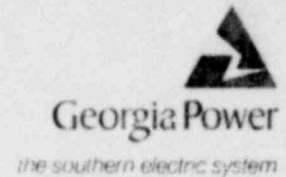


Georgia Power Company
230 Peachtree Street
Post Office Box 4545
Atlanta, Georgia 30303
Telephone 404 522-6060

Power Supply Engineering and Services

April 10, 1979



United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

REFERENCE:
RII: RFR, III
50-321/79-8
50-366/79-10

ATTENTION: Mr. James P. O'Reilly

Gentlemen:

The following information is submitted in response to your letter dated March 6, 1979, containing inspection report 50-321/79-8 and 50-366/79-10.

50-366/79-10 (Infraction)

This infraction resulted from failure to report that both HPCI (High Pressure Coolant Injection) and RCIC (Reactor Core Isolation Cooling) systems were apparently inoperable at the same time. Although such reporting is required by Section 6.9.1.9.c of the Tech Specs, the plant staff did not consider HPCI to be inoperable at the times indicated by the NRC inspector. HPCI was tested in accordance with Section 4.5.1.a and b of Tech Specs by a manual start and full flow test, but this application of operability was disputed by the inspector.

Previous practice has been to perform a manual rated flow and/or valve operability test following maintenance. This practice appeared to conform to the operability requirements, but these requirements may not be clearly defined particularly with regard to HPCI and RCIC. Tech Specs Section 4.5.1 does not require an automatic initiation, whereas paragraph 1.20 "Operable-Operability" implies that an automatic initiation may be required. This difference is not significant for other pumps because the pump response is the same for both manual and automatic starting; however, HPCI and RCIC may have different responses to manual and automatic starting.


Georgia Power Company management has evaluated the question of what constitutes operability and has developed the following position. An operable component does not require the performance of an automatic start; however, should a failure occur in response time, overspeed trip, or control system problems which could affect the ability of the pump to automatically function, an automatic initiation test (without injection into the vessel) in addition to other testing, as appropriate, would be performed to prove operability. This policy would also be extended to any modification or routine maintenance which could affect the ability of the pump to automatically function. An important distinction is that the electrical logic, which is tested by a logic system functional test, would not be included in the automatic initiation because it cannot affect pump response after the start signal has been received.

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PHOTOCOPY

Georgia Power 

U. S. Nuclear Regulatory Commission
ATTN: Mr. James P. O'Reilly
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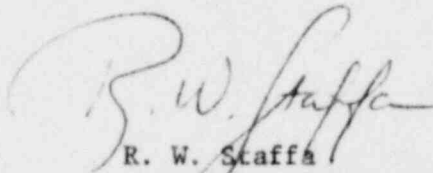
Procedures for automatic start testing of HPCI and RCIC as required will be completed no later than May 15, 1979, and appropriate reporting will be made of the aforementioned event no later than May 1, 1979.

50-366/79-10-02

The failure to report the exceeding of the Level 1 acceptance criteria for recirculation flow coastdown following a turbine trip at seventy-five percent power was caused primarily by the nuclear steam supply manufacturer having advised the plant staff that the actual observed values would be acceptable. General Electric Company was advised of the circumstances and issued permission, both verbally and in writing, to ascend in power and continue testing. Plant management reviewed the justification and the decision was made to proceed to the next power level. General Electric later notified Georgia Power that their justification had been in error and the plant was lowered to the fifty percent power level. This was determined to have been an administrative error and will be appropriately reported no later than May 1, 1979.

This report contains no information which is considered to be proprietary.

Very truly yours,



R. W. Staffa
Manager, Quality Assurance

DRS/bg

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