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Georgia Power

the southern electric system

V. A. Widner
General Manager

August 5, 1980

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 3100
101 Marietta Street, NW
Atlanta, Georgia 30303

REFERENCE:
RII: PAT
50-321/80-17
50-366/80-17

ATTENTION: Mr. James P. O'Reilly

Gentlemen:

Your letter of July 11, 1980, requested an additional written response to Item B of our June 12, 1980, letter. Following is Georgia Power Company's response:

In reviewing the cited examples of improper reporting it should be noted that the events cited occurred early in 1980 (latest one on February 26, 1980). On April 17, 1980, procedure HNP-425, "Deviation Report", was revised to further clarify its use. A significant addition to the form was a requirement to explain in detail the event, the circumstances leading to the event, the consequences of the event, and the Tech Specs which may be affected by the event. This additional requirement provides a more complete picture of the event for the personnel who must determine reportability to the NRC.

LER (50-366/80-02) Lack of seismically qualified RHRSW and PSW minimum flow piping support.

We have instructed our A/E to specifically identify any seismic support deficiencies. The consequences of these deficiencies are to be delineated in a notification letter. Recommendations for reportability and promptness of repair are to be included. This arrangement should insure proper reporting of seismic support deficiency.

Deviation Report 1-80-56 Failure of Standby PSW Pump During HNP-1-3801.

The procedure governing ISI testing of the Standby PSW pump, which is being submitted for revision, instructs the personnel performing the testing to restore the test valves to the original position regardless of whether the test was successful or not. This change (if approved) would prevent a pump from being left in a potentially degraded configuration following an unsuccessful test while an evaluation is being made of the test results.

LER (50-321/80-24) Failure of "C" Diesel Generator Voltage Regulator in the Manual Mode

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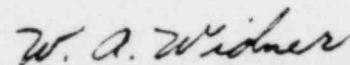
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It is questionable whether an accurate evaluation of the condition of the "1C" D/G could be made based on the initial event cited (Deviation Report 1-80-101) since the D/G was run successfully later that day. However, it is felt that the new deviation report form would provide sufficient information for determining reportability. Additionally, in light of the conversations between the NRC and the licensee concerning items in this infraction, it is felt that sufficient guidance for determining reportability in the future has been provided.

In conclusion, the licensee feels that the revised deviation report form has alleviated some of the past problems in determining reportability. This goal was accomplished by requiring a more complete description of the event and a preliminary determination of reportability. Discussions with the resident inspector have clarified some positions on reportability and have provided insight into the reasons for the infraction. It is felt that our efforts have brought the desired results and that compliance has been achieved.

Should you have any questions concerning this letter, please contact this office.

Sincerely,



W. A. Widner

DLT/mb