

Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-3195

Mailing Address
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 868-5581

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the southern electric system

W. G. Hairston, III
Senior Vice President
Nuclear Operations

ELV-01261
0209

Docket Nos. 50-424
50-425

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

Gentlemen:

**VOGTLE ELECTRIC GENERATING PLANT
REPLY TO A NOTICE OF VIOLATION**

Pursuant to 10 CFR 2.201, Georgia Power Company (GPC) submits the enclosed response to NRC violation 50-424/89-33-01 and 50-425/89-38-01. The violation was identified during the inspection conducted by Mr. J. F. Rogge and Mr. R. F. Aiello of the NRC during the period of October 28 - December 1, 1989. In the enclosure, transcription of the violation precedes GPC's response.

Please contact this office if you have any questions.

Sincerely,


W. G. Hairston, III

WGH, III/NJS/gm

Enclosure: Violation 50-424/89-33-01 and 50-425/89-38-01 and GPC Response

c(w): Georgia Power Company
Mr. C. K. McCoy
Mr. G. Bockhold, Jr.
Mr. P. D. Rushton
Mr. R. M. Odom
NORMS

U. S. Nuclear Regulatory
Mr. S. D. Ebnetter, Regional Administrator
Mr. D. B. Matthews, Director, Project Directorate II-3
Mr. R. F. Aiello, Senior Resident Inspector, Vogtle

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ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2
NRC NOTICE OF VIOLATION 50-424/89-33-01 AND 50-425/89-38-01 AND GPC RESPONSE

"10 CFR Part 50, Appendix B, Criterion V, states that activities affecting quality 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.

Technical Specification 6.7.1a requires that written procedures be established, implemented, and maintained covering activities delineated in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Revision 2, February 1978, delineates the types of safety-related activities that should be covered by written procedures and includes administrative procedures and procedures for performing maintenance.

Administrative Procedure 00101-C, "Drawing Control," Revision 7, Step 3.4.4, requires that drawing legibility be ensured prior to distribution.

Engineering Procedure 50009-C, "As-Built Notices," Revision 7, Step 4.6.3, requires As-Built Notices to be legible and reproducible.

Contrary to the above, on November 22, 1989, the NRC identified that Administrative Procedure 00101-C, "Drawing Control," Revision 7, Step 3.4.4, and Engineering Procedure 50009-C, "As-Built Notices," Revision 7, Step 4.6.3, were not implemented in that critical control room drawings and attendant As-Built Notices existed which were not legible.

This violation is similar to a violation issued June 15, 1989.

This is a Severity Level IV violation (Supplement I)."

RESPONSE TO VIOLATION 50-424/89-33-01 AND 50-425/89-38-01

Admission or Denial of the Violation:

The violation occurred as stated.

The Reason for the Violation:

The cause of the violation was that standard plant policy/administrative controls were less than adequate. Various plant personnel involved in generating As-Built Notices (ABNs), reproducing drawings and posting them in the Control Room did not pay sufficient attention to the legibility aspect of the drawings. Also, the users of the drawings were not advised on the appropriate actions to take when given illegible drawings.

Finally, a contributing cause to the violation was that the reproduction equipment was inadequate and the quality of the drawings was affected.

ENCLOSURE (CONTINUED)

NRC NOTICE OF VIOLATION 50-424/89-33-01 AND 50-425/89-38-01 AND GPC RESPONSE

Corrective Steps Which Have Been Taken and the Results Achieved:

The following corrective steps were taken:

- o All Control Room Drawings were immediately replaced by drawings reproduced by Document Control and reviewed by Engineering Support personnel to ensure legibility. Any ABNs which appeared to be illegible were voided and new, legible ABNs were issued.
- o The importance of preparing legible ABNs was emphasized to all Engineering Support personnel
- o Performance based personnel accountability for quality engineering preparation of ABN's to ensure legibility was established.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

The following corrective steps will be taken:

- o Brief all control room personnel on action to take when illegible drawings are encountered.
- o Establish performance based personnel accountability for posting Control Room and Clearance and Tagging (C&T) drawing revisions and ABNs.
- o Continue monthly audit of Control Room and C&T drawings.
- o Procure improved reproduction equipment capable of producing high quality, improved resolution drawings.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on 12/01/89 with the removal/reproduction of all Control Room drawings.

The additional corrective steps shown above, which will be taken to avoid further violations, will be completed by 6/01/90.