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

February 14, 1991

ELV-02478
0815

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 information in response to a violation identified in Inspection Report 50-424/90-30 and 50-425/90-30 which concerns the inspection conducted by Mr. B. R. Bonser of the NRC from November 24 - December 21, 1990. 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
W. G. Hairston, III

WGH, III/JLL/gm

Enclosure: Violations 50-424/90-30 and 50-425/90-30 and GPC Response

c(w): Georgia Power Company
Mr. C. K. McCoy
Mr. W. B. Shipman
Mr. R. M. Odom
Mr. P. D. Rushton
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebnetter, Regional Administrator
Mr. D. S. Hood, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

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ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2
NRC NOTICE OF VIOLATIONS 50-424/90-30 AND 50-425/90-30 AND GPC RESPONSE

"10 CFR 50, Appendix B, Criterion XVI, Corrective Action, requires in part that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of condition is determined and corrective action taken to preclude repetition.

Contrary to the above the licensee failed to fully implement the corrective actions following identification of control room drawing legibility problems in November, 1989. This resulted in continued control room drawing problems as exemplified by wrong revisions, missing As Built Notices, and drawings which were superseded but still on file.

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

RESPONSE TO VIOLATIONS 50-424,425/90-30

Admission or Denial of the Violation:

The violation occurred as stated. However, after careful review of conditions surrounding this violation, Georgia Power Company (GPC) feels that the severity level should be reclassified to a Severity Level V. During a Safety Audit and Engineering Review (SAER) audit completed in December 1990, GPC identified these problems with control room drawings and briefed the NRC resident inspectors. It should be noted that:

1. The SAER group was performing frequent audits to verify compliance and to assure that the Corrective Action Program was properly functioning.
2. The Manager of Safety Audit and Engineering Review was directed in early 1990 by the Vice President - Vogtle to put special emphasis on control room drawings during audits. The SAER group completed an audit in June 1990 that noted a significant improvement in the maintenance and control of drawings. Only a few minor discrepancies were identified.
3. The SAER audit completed in December 1990 noted that control room drawings contained incorrect revisions and were missing open As-Built Notices (ABN's). No legibility problems were identified. An uncompleted corrective action from the previous NRC violation response was noted.
4. Georgia Power Company was in the process of correcting these deficiencies through our normal administrative programs.

ENCLOSURE (CONTINUED)

NRC NOTICE OF VIOLATIONS 50-424/90-30 AND 50-425/90-30 AND GPC RESPONSE

These deficiencies were self-identified by GPC through our efforts to ensure continued proper control and legibility of control room drawings. Actions which have been taken by GPC are a part of our corrective action program and have been successful in correcting the legibility problems. However, our corrective action did not fully correct the control room drawing control problem. As noted above, this deficiency was identified by GPC and discussed with the resident inspector. The correction of the legibility problems and the self identification of the drawing control deficiencies is the basis for our request to downgrade this violation to a Severity Level V status.

Reason for the Violation:

There were two reasons for this violation, which are described below.

As a result of efforts to improve the legibility of control room drawings, VEGP had initiated a process of sending high quality drawings direct from the architect-engineer (A/E) to the control room. This process was in conflict with Procedure 00101-C "Drawing Control." Since this process circumvented the normal methods of maintaining drawings, the posting of ABN's and drawing revisions was not properly performed.

Georgia Power Company discontinued monthly audits as specified in the response to Violation 50-424/89-33 and 50-425/89-38. Monthly audits were performed for the months of November and December 1989, and January, February, March and April 1990. The monthly audits were discontinued in May 1990 following the SAER audit which noted that legibility problems with control room drawings had been rectified. The SAER audit also noted that the control of drawings in the control room was much improved over previous audits. Had these monthly audits continued, the drawing control problems would have been identified sooner. Since they were discontinued, the problem was not identified until the SAER audit completed in December 1990.

Corrective Steps Which Have Been Taken and the Results Achieved:

- o A complete audit of Operations drawings and correction of all discrepancies was initiated and completed in December 1990.
- o On January 21, 1991, Document Control resumed the responsibility of distributing controlled drawings to the control room.
- o Monthly reviews of control room drawings have been resumed. These reviews were completed in January 1991 and February 1991. Additionally, the requirement for these reviews has been proceduralized in Procedure 00101-C, "Drawing Control" and 00103-C, "Document Distribution and Control." These monthly reviews will be performed until management determines that the problems with control of control room drawings no longer warrant monthly reviews, at which time a longer review cycle may be established.

ENCLOSURE (CONTINUED)

NRC NOTICE OF VIOLATIONS 50-424/90-30 AND 50-425/90-30 AND GPC RESPONSE

- o A memorandum has been issued to all Shift Superintendents to heighten their awareness of these drawing problems.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

The above actions are sufficient to prevent recurrence of the violation.

Date When Full Compliance Will Be Achieved:

Control room drawings were verified to be correct as of December 4, 1990. Compliance with Procedure 00101-C was achieved on January 21, 1991, when Document Control resumed the responsibility of distributing controlled drawings to the control room.