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the southern electric system

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

ELV-01389
0268

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 50-424/89-35-01 and 50-425/89-40-01. The violation was identified during the inspection conducted by Mr. J. F. Rogge, Mr. R. F. Aiello, and Mr. R. D. Starkey of the NRC during the period of December 2, 1989 - January 5, 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

WGH, III/NJS/gm

Enclosure: Violation 50-424/89-35-01 and 50-425/89-40-01 and GPC Response

c(w): Georgia Power Company
Mr. C. K. McCoy
Mr. G. Bockhold, Jr.
Mr. R. M. Odom
Mr. P. D. Rushton
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U. S. Nuclear Regulatory Commission
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
NRC NOTICE OF VIOLATION 50-424/89-35-01, 50-425/89-40-01 AND GPC RESPONSE

"10 CFR Part 50, Appendix B, Criterion λ , the licensee's accepted Quality Assurance Program, and the Final Safety Analysis Report (FSAR), Section 17.2.10, require that a program for the inspection of activities affecting quality be established and executed by, or for, the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity.

ANSI N45.2.4, 1972 (also designated as IEEE Standard 336-1971), committed to in FSAR Chapter 1.9.30, states that checks and inspections shall be performed to verify the operational readiness and completeness of components and systems.

Plant Procedure 85024-C, Electrical Inspection, implements inspection activities by providing for the establishment and control of Quality Control hold points in work activities. Procedure step 4.5.3 requires hold points for verifying that battery terminations are tightened or torqued to the values listed in Procedure 27915-C.

Contrary to the above, on December 29, 1989, the inspector identified that checks and inspections were not performed to verify the operational readiness and completeness of a safety-related system while conducting repairs on the Class 1E 125V DC power system. Plant Procedure 85024-C was not followed in that Quality Control hold points were not established for maintenance Work Order 18905060, which was implementing a temporary modification involving cell jumping. Further review determined that hold points were not being established on any work orders which implemented temporary modifications.

This is a severity level IV violation (Supplement 1)."

RESPONSE TO VIOLATION 50-424/89-35-01 AND 50-425/89-40-01

Admission or Denial of Alleged Violation:

A violation did occur but not directly as stated. The violation which actually occurred was a failure to follow procedure in that the cited Maintenance Work Order (MWO) was not adequately reviewed for electrical termination hold points. Therefore, the violation was not a failure to assign a hold point, but a failure to perform an adequate review for electrical termination hold points.

Reason for the Violation:

The cause of this violation was personnel error. The violation occurred as a result of a Quality Control (QC) Inspector misinterpreting the policy of assigning hold points for temporary modifications. The inspector believed that the Engineering observation and evaluation was sufficient and QC did not need to witness the temporary modification installation. Therefore, the inspector did not adequately review the MWO for electrical termination hold points.

ENCLOSURE (CONT'D)

VOGTLE ELECTRIC GENERATING PLANT
NRC NOTICE OF VIOLATION 50-424/89-35-01, 50-425/89-40-01 AND GPC RESPONSE

Corrective Steps Which Have Been Taken and the Results Achieved:

1. A list of 1989 Temporary Modifications (TM's) has been reviewed to determine the extent of the problem. This review identified sixteen TM's that had system numbers which indicated they might warrant QC inspection. Of the sixteen, twelve TM's were identified as being safety related based on the safety classification assigned to the MWO which either implemented or removed the TM. These twelve fell within the scope of VEGP's Quality Control Inspection Program. The following is the result of the MWO review associated with the twelve TM's:

TM 1-89-001	QC hold points were assigned for the installation of the TM.
TM 1-89-002	QC hold points were assigned for the installation and removal of the TM.
TM 1-89-018	No QC hold points were assigned as the item was not safety related and did not constitute an impact on seismic considerations which required QC involvement.
TM 1-89-019	QC hold points were assigned for the installation of the TM. QC hold points were not assigned to the removal of the TM as the removal MWO was identified as non-safety related.
TM 1-89-021	QC hold points were not assigned for the opening of links to eliminate a system bypassed indicator light. The TM is still active.
TM 1-89-025	QC hold points were not assigned for installing lead (jumpers) on a battery bank. This is the work NRC questioned. The TM is still active.
TM 1-89-027	QC hold points were assigned for the removal of valve internals. The TM is still active.
TM 2-89-008	QC hold points were assigned for resetting setpoints. The TM is still active.
TM 2-89-011	QC hold points were assigned for the installation and removal of blind flanges.
TM 2-89-013	QC hold points were assigned for the utilization of spare contacts. The TM is still active.

ENCLOSURE (CONT'D)

VOGTLE ELECTRIC GENERATING PLANT
NRC NOTICE OF VIOLATION 50-424/89-35-01, 50-425/89-40-01 AND GPC RESPONSE

Corrective Steps Which Have Been Taken and the Results Achieved:

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| TM 2-89-014 | QC hold points were not assigned for the lifting of wires. QC hold points were assigned for the retermination of the wires. |
| TM 2-89-019 | QC hold points were not assigned for the installation or removal of temporary tubing attached to drain valves. |

Based on the results of this review, GPC believes that MWO 18905060 is an isolated case of failure to adequately review for electrical termination hold points. In each of the above cases, with the exception of the MWO which is the subject of this violation, a review was performed as required and hold points were assigned as appropriate.

2. A formal notice was given to each QC Inspector discussing this violation and the requirements for inspecting temporary modification work.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

The above corrective actions are adequate to prevent recurrence of this violation.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved for the above corrective actions on February 12, 1990.