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USNRC REGION II
ATLANTA, GEORGIA

December 4, 1981

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Georgia Power

the southern electric system

W. A. Widner
Vice President and General Manager,
Fossil and Hydro Generation

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

REFERENCE:
RII: PJK
50-321/50-366
Inspection Report
81-24

ATTENTION: Mr. P. J. Kellogg

GENTLEMEN:

The following reply is submitted in response to your letter dated November 4, 1981, inspection report 50-321/81-24 and 50-366/81-24.

VIOLATION

Environmental Technical Specification 5.3.2.2 requires that audits of facility activities shall be performed at least once a year under the cognizance of the Safety Review Board to ensure conformance of facility operation to all provisions of the Environmental Technical Specifications (ETS). ETS-3.2, Table 3.2-1, specifies the performance of an analytical program.

Contrary to the above, audits of the analytical program were not performed in 1980 and 1981, through October 6, 1981.

This is a Severity Level V Violation (Supplement VII.E.).

RESPONSE:

Georgia Power Company denies the alleged violation based on the below explanation:

The NRC issued Reg. Guide 1.144, based on the defense-in-depth provided by the QA/QC programs of both licensees and contractors. In Reg. Guide 1.144, the NRC established the adequacy of triennial audit programs.

Georgia Power Company has established a policy consistent with Reg. Guide 1.144, Revision 1, September 1980, for all suppliers of safety-related spare/replacement parts, commodities and services. Contractors providing environmental radiological analyses are included with this program.

Section 5.3.2 of the ETS requires that an annual overview audit of the Environmental Program be performed. Part of this overview includes the control and evaluation of environmental contractors in accordance with Reg. Guide 1.144. It does not require each environmental contractor to be audited on an annual basis.

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Our experience with the triennial audit program of environmental contractors has proven to be satisfactory with no major problem being discovered.

If you have any further questions on this matter, please do not hesitate to contact my office.

W. A. Widner states that he is Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that to the best of his knowledge and belief the facts set forth in this letter are true.

GEORGIA POWER COMPANY

By: W. A. Widner
W. A. Widner

Sworn to and subscribed before me this 4th day of December, 1981.

Mae H. Battle Notary Public, Georgia, State at Large
My Commission Expires Sept. 20, 1983
Notary Public

MJB/mb

xc: M. Manry
R. F. Rogers, III