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NUCLEAR REGULATORY COMMISSION
REGION II - SUITE 3100
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Georgia Power
the southern electric system

February 4, 1982 8 Ail : 11

J. T. Beckham, Jr.
Vice President and General Manager
Nuclear Generation

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

REFERENCE:
RII: RCL
50-321/50-366
Inspection Report
81-27

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

In our letter to you dated December 30, 1981, we responded to the referenced Inspection Report. Pierce Skinner and Virgil Brownlee of your staff contacted this office on January 15, 1982 to request clarification of our response to Violation B. This letter restates our response to provide more detail about revisions made to HNP-25 to improve QA Program control of safety-related procedures.

VIOLATION B

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be prescribed by documented instructions, procedures or drawings appropriate to the circumstances. The accepted QA Program (FSAR 17.2.5.1) requires that administrative procedures, inspection plans, tests, calibrations, special processes, maintenance, modifications, repair procedures and changes thereto be reviewed and concurred with by the site QA Department to ensure inclusion of quality requirements. HNP-25, Quality Assurance Review of Plant Procedures, establishes the method of complying with FSAR Section 17.2.5.

Contrary to the above, HNP-25 is inadequate for the following reasons:

1. Table 1 does not include all procedures required to be reviewed by QA.
2. Figure 1 is not included in the procedure, but referenced in several procedural steps involving mandatory and recommended changes.
3. A method is not provided by which QA concurs that a procedure contains acceptable quality assurance requirements prior to issuance.
4. Mandatory changes must be made to comply with guidelines, but step C.5 states that QA comments will be considered for implementation as a subsequent procedure revision.

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VIOLATION B (Continued)

5. The procedure does not address the requirement that changes to existing procedures be reviewed for quality requirements by the QA Department.

RESPONSE

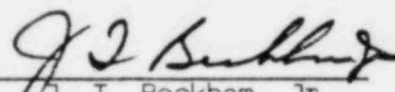
1. The violation occurred as stated.
2. It occurred because procedure HNP-25, "Quality Assurance Review of Plant Procedures", did not fully reflect the requirements of FSAR Section 17.2.5.
3. To correct these deficiencies, HNP-25, Revision 4, was issued on November 5, 1981, to address each item as follows:
 1. Table 1 has been deleted from procedure HNP-25. The procedure now requires the use of the safety-related procedures index as described in procedure HNP-9.
 2. Figure 1 has been added to the procedure by Revision 4, and references have been checked to ensure that they are correct.
 3. A review program has been initiated to complete a review of all safety-related procedures currently issued. New procedures shall be reviewed as these procedures are developed and determination made as to their safety-related status.
 4. Revision 4 of HNP-25, paragraph 4, describes the different categories of comments. Immediate Mandatory, Mandatory, and Compulsory Comments must be incorporated in the procedure, or resolved within the periods indicated.
 5. Paragraph B in HNP-25 Rev. 4 states that changes to procedures shall be reviewed by the site QA department. An internal control program includes guidelines to ensure revisions to procedures are reviewed within sixty days after being issued. The control program is described in QA memo 81-328 dated November 4, 1981.
4. These changes have been implemented and full compliance with FSAR Section 17.2.5 has been achieved.

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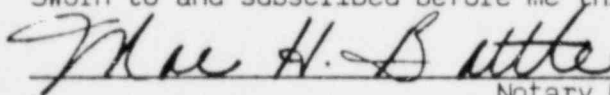
Please contact this office if you have further questions about this response.

J. T. Beckham, Jr. 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: 
J. T. Beckham, Jr.

Sworn to and subscribed before me this 4th day of February, 1982.



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

PLS/mb

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