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ATTACHMENT 8

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Vogle Project

November 23, 1988

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

File: X7N00.0-39
Log: GN-1502

NRC DOCKET NUMBERS 50-424 AND 50-425
OPERATING LICENSE NPF-68
CONSTRUCTION PERMIT NUMBER CPPR-109
VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 AND 2
FSAR AMENDMENT NUMBER 39

Gentlemen:

Georgia Power Company, acting on its own behalf and as agent for Oglethorpe Power Corporation, Municipal Electric Authority of Georgia, and the City of Dalton, Georgia, hereby submits Amendment 39 to the Vogle Electric Generating Plant (VEGP) Final Safety Analysis Report (FSAR).

The changes resulting from this amendment are identified in the Attachment. These changes are applicable to both Units 1 and 2. All substantive changes, for Unit 1, were evaluated as required by Title 10 CFR 50.59. This amendment contains all the known processed changes for Unit 2 as of October 31, 1983. Due to the time lag associated with the as-built notification process, not all of the FSAR figures have been updated in this amendment. Our submittals to the staff, as noted in the Attachment, do contain the information on drawing modification sheets and provide the appropriate cross references to the affected FSAR figures. Your staff will be notified should the final drawings materially differ from what was previously provided.

In accordance with the requirements of Title 10 CFR 50.30(f) and Title 10 CFR 50.4(b), one (1) signed original and thirty-seven (37) copies of Amendment 39 are submitted for your use. Also in accordance with the requirements of Title 10 CFR 50.4(b), copies of Amendment 39 are being sent to the NRC Regional Office and the NRC Resident Inspector.

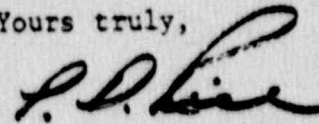
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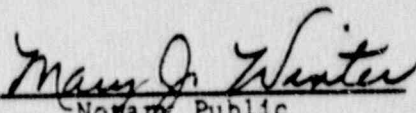
Should you have any questions on the enclosed submittal, do not hesitate to contact me.

Yours truly,



P. D. Rice

SWORN AND SUBSCRIBED BEFORE ME, THIS 22nd DAY OF November, 1988.



~~Notary~~ Public
Alabama State at Large

My commission expires ~~My~~ Commission Expires November 24, 1991

PDR/sm

Attachment

xc: NRC Regional Administrator
NRC Resident Inspector
FSAR Distribution List

13.1.1.2.2 Nuclear Operations Organization

The nuclear operations organization, under the supervision of the executive vice president-nuclear operations, has direct responsibility for the operation and maintenance of GPC's nuclear plants. The nuclear operations organization consists of the plant operating staffs, the safety audit and engineering review organization, and the nuclear support (Vogtle) organization which provides support in the areas of engineering, licensing, maintenance, and administration.

Engineering support during plant operation will be provided primarily by the SCS Nuclear Plant Support Department. The SCS Technical Services-Nuclear Department will provide nuclear fuel contract administrative services, reload licensing, and operating licensing support. The structure of the General Office organization is shown in figures 13.1.1-2 and 13.1.1-3 and is described in the following paragraphs.

13.1.1.2.2.1 Executive Vice President-Nuclear Operations. The executive vice president-nuclear operations, an officer of both Georgia Power Company (GPC) and Alabama Power Company (APC), is responsible to the chairman and CEOs of each company for all aspects of operation of the nuclear generating plants in the GPC and APC systems, as well as technical and administrative support activities provided by SCS. The executive vice president-nuclear operations directs the senior vice president-nuclear operations in fulfillment of his responsibility.


13.1.1.2.2.2 Senior Vice President-Nuclear Operations. The senior vice president-nuclear operations, an officer of both Georgia Power Company (GPC) and Alabama Power Company (APC), reports to the executive vice president-nuclear operations. This individual is responsible for the safe, reliable, and efficient operation of Plants Vogtle, Hatch, and Farley. The senior vice president-nuclear operations directs the efforts of the vice president-nuclear (Vogtle), the vice president-nuclear (Hatch), and the vice president-nuclear (Farley).

13.1.1.2.2.3 Vice President-Nuclear (Vogtle). The vice president-nuclear (Vogtle) reports to the senior vice president-nuclear operations and is responsible for operation and maintenance of Plant Vogtle as well as licensing, engineering, maintenance, and administrative support activities. The vice president-nuclear (Vogtle) directs the general manager-nuclear plant (Vogtle), the general manager-nuclear support (Vogtle), and the manager-safety audit and engineering review (Vogtle).

13.1.1.2.2.4 General Manager - Nuclear Support (Vogtle). The general manager-nuclear support (Vogtle) reports to the vice president-nuclear (Vogtle) and is responsible for corporate support in the areas of engineering, licensing, maintenance, and administration. The general manager-nuclear support (Vogtle) directs the manager-nuclear engineering and licensing (Vogtle), the manager-nuclear maintenance and support (Vogtle), and the manager-nuclear administration (Vogtle).

13.1.1.2.2.5 Manager-Safety Audit and Engineering Review (Vogtle). The responsibilities of the manager-safety audit and engineering review (Vogtle) are described in section 17.2.

Interoffice Correspondence

Georgia Power 

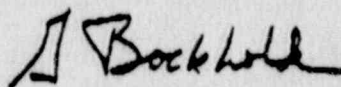
DATE: August 21, 1990
RE: Operational Assessment Inspection
FROM: G. Bockhold, Jr.
TO: Plant Employees

As many of you know, the NRC recently concluded an Operational Assessment Inspection. The inspection, among other things, included investigation of a number of allegations of "wrongdoing," such as intentional violations of NRC requirements. Some VEGP employees were interviewed formally in "on the record" interviews.

The NRC appropriately investigates allegations of wrongdoing which bear on matters of safety or public health in a thorough and deliberate manner. While a formal interview may be disconcerting or stressful, these reviews are sometimes necessary. Georgia Power encourages cooperation in these investigations and views it as essential that the NRC obtain the relevant and material facts.

We have been informed that all allegations of wrongdoing by VEGP employees were found to be unsubstantiated. At the same time, the Operational Assessment team identified several technical items where potential violations of NRC requirements may have occurred. For example, the NRC observed at least one instance in which a Deficiency Card was not issued for equipment repair, contrary to our practices. We must remember to use our Deficiency Card system; only by identifying potential deficiencies can we achieve our high standards of excellence in all of the areas which support this plant. All of us need to be reminded to pay strict attention to detail -- to dot all the i's and cross all the t's -- in each of our daily tasks.

I want to thank all of you who worked diligently to support the Operational Assessment team. Your cooperation during this difficult time is greatly appreciated. I, personally, am very proud of the professionalism shown by each of you and encourage you to maintain those high standards as we move forward to fulfill our goal of efficient and, foremost, safe operation of the Vogtle Electric Generating Plant.



AD/TVG/GB/tdm

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NRC Concern

1. The NRC is concerned about the incorrect number of diesel starts reported in LER 1-90-06 and the number of starts presented to the NRC on April 9, 1990 and in the confirmation response letter of April 9, 1990. The major issue remaining is to try and determine through personal interviews, how the number of 19 for diesel 1B was arrived at in the April 9 letter to the NRC. The NRC believes the intent of the April 9 letter and the presentation discussed consecutive successful starts. The revised response to LER 90-06 did not clarify the number of starts reported to the NRC April 9, and did not clarify that the 19 starts were not consecutive.
2. The inspector noted that documentation provided by Operations to support diesel trending (14980-C and 13145-C data sheets) does not contain an adequate description of what happens during the start attempt. The plant is not interpreting Reg Guide 1.108 properly with regard to reporting valid and non-valid failures. There may be valid and non-valid failures that were not reported. The NRC does not consider the current status of reporting diesel failures to be in compliance with commitments made to the NRC in Violation 50-424/87-57.

NRC Documentation

The NRC has reviewed the diesel start log and supporting documentation (14980-C and 13145-C data sheets). The NRC currently believes some problems identified on 14980's and 13145's should be classified as non-valid failures and reported to the NRC. The NRC has requested and received written analysis to explain the disposition of the following 1B diesel starts: #'s 123, 124, 132, 133, 134, 136, 160, 161, 162, 164, 165, and 190. LER 1-90-06, revision 1; QA Audit Report OP26-90/33; QA Audit Report OPO9-90/31; and Special Report 1-90-05, dated August 7, 1990; GPC confirmatory action letter dated April 9, 1990.

VEGP Position

1. The error made in the number of diesel starts reported to the NRC on April 9, 1990, and in LER 1-90-06 is attributed to two factors:
 - a. The testing as described in LER 90-06, revision 0, was in the "context of" and "in reference to" the diesel control systems. The first two sentences of the 5th paragraph explain actions taken with regard to sensor calibrations and control system testing. In this context, the test program correlates to testing discussed with the NRC on April 9, 1990, and reported in the April 9, 1990, confirmatory letter. The LER 90-06 comment of "subsequent to the test program" was not intended to exclude successful diesel starts before declaring the diesel operable. As a result, diesel starts after testing of the control systems, but before a declaration of operability were counted. The transmittal letter for LER 90-06, revision 1, describes the confusion and attempts to clarify the concern by redefining the types of starts and the point of counting.

DIESEL STARTS AND FAILURE REPORTING

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- b. LER 90-06, revision 1, was intended to clarify any inadvertent "misleading" of the NRC on successful operation of the diesel control systems. When Vogtle Management was aware of the problem in LER 90-06, revision 0, management notified the NRC Residents. Also at the corporate office on 6/11/90, W. Shipman contacted Ken Brockman and on about 6/11/90, W. G. Hairston, III, contacted Mr. S. Ebner of NRC Region II. The revised LER was submitted on 6/29/90.

The 19 starts discussed on April 9 were based on operator assessments of the starts as successful using VEGP procedures. Additional review of these starts by both the NRC and Vogtle personnel indicates start #134, performed on March 23, 1990, could be counted as unsuccessful. If start #134 is not counted, only 14 successful starts occurred before April 9, 1990. This start will be reviewed in detail and an appropriate report to clarify the number of starts reported April 9, 1990 will be made.

2. After a thorough review of Reg Guide 1.108, Engineering Support (Mike Horton) agreed that all diesel start problems have not been reported as failures. GPC's response to NRC Violation 424/87-57 committed to report such equipment problems as failures; however, due to internal administrative problems, the commitment was not implemented. Engineering Support intends to review diesel start records for any unreported failures.

VEGP Documentation

- o LER 1-90-06, revision 1; QA Audit Report OP26-90/33; QA Audit Report OP09-90/31; and Special Report 1-90-05, dated August 7, 1990; GPC confirmatory action letter dated April 9, 1990.
- o 1B diesel start analysis available 8/15/90 and Reg Guide 1.108 position from Engineering Support.

8/22/90
Time: 12:00

Answer: G. Dockhold, Jr.

Answer: W. G. Halston. 111

Answer: The LER was approved by M. G. Halfrston. III

Answer: Corporate Licensing personnel in conjunction with the phone conversation described above made editorial changes as directed. Those present during the phone conversation are thought to be W. Shipman, G. Beckhold, Jr., A. L. Mosbaugh, J. G. Aufdenkampe, and J. Stringfellow.