

January 24, 1983

Docket Nos: 50-424
and 50-425

Mr. Doug Dutton, Vice President
Project Management
Georgia Power Company
P.O. Box 4545
Atlanta, Georgia 30302

DISTRIBUTION:
Docket Nos. 50-424/425
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Dear Mr. Dutton:

Subject: Acceptance of Field Change Notice System

In your letter of October 15, 1982, you discuss Georgia Power Company's field change notice (FCN) system and respond to our questions of September 20, 1982, on the system. We have reviewed your letter of October 15 and discussed the system with GPC personnel. We understand that the following controls are documented and are applied to the FCN system:

A. Software Controls

1. Designated Georgia Power Company (GPC) Field Operations personnel review and approve FCNs prior to execution of work.
2. FCNs, thus approved, are distributed to appropriate GPC Field Operations personnel and contractor QC personnel prior to execution of work.
3. GPC Construction QC personnel must have an FCN, thus approved, to allow work in progress to continue.
4. GPC transmits FCNs to the design engineering home office.
5. The originating design engineering group must review each FCN and report its acceptance by return of the signed-off FCN within 5 working days from receipt or its nonacceptance by telephone or telecopy within 5 working days and by letter within 30 working days from receipt.
6. Every other month GPC Construction Quality Control reviews all FCNs to verify compliance with commitments.
7. GPC Quality Assurance audits all FCNs.
8. GPC Quality Assurance audits verify compliance with the controls.

B. Hardware Controls

1. The FCN system is applied only to minor changes to drawings and specifications.

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2. An FCN cannot be used in lieu of a deviation report or nonconformance report. (That is, if hardware has been installed such that it fails to meet design requirements, an FCN cannot be used to solve the problem.)
3. For unapproved FCNs, GPC will take whatever action is required to meet the approved design.
4. FCNs can only be written against Bechtel drawings and specifications which have been "approved for construction."
5. FCNs cannot be used to violate or deviate from a governing code or standard.
6. FCNs cannot be used on vendor supplied equipment such as pumps and valves.
7. FCNs cannot be used on safety-related piping systems (i.e., pipe spools, pumps, valves, pipe supports, etc.)
8. On electrical systems, FCNs can only be used to resolve field conflicts on cable tray routing and supports and conduit routing and supports.

C. Personnel Controls

1. The originating design engineering group must approve each FCN for it to be ultimately effective.
2. GPC approval authority for FCNs is limited to 12 personnel, 5 of whom are at the manager level and all of whom have the expertise required to make knowledgeable decisions regarding FCNs they approve.
3. Authorized construction personnel below manager level can approve FCNs in their respective disciplines only, i.e., mechanical, electrical, or civil.
4. The ACPM II - Administration, who does not have FCN approval authority, is responsible for logging, transmittal, receipt, and distribution of FCNs.

Experience to date with the FCN system appears to be good. In addition to the above, however, it is requested that for rejected FCNs an analysis should be made as part of the corrective action to determine the root cause of the rejection to preclude recurrence. The goal of the system should be to achieve a zero rejection rate.

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Mr. Doug Dutton

Based on our understanding of the FCN controls and criteria for their use as noted above, their documentation in procedures, and GPC's proper implementation of the system, we find the FCN system acceptable. Should our understanding of the system be incorrect in any way, you are requested to advise us. We also request that you keep us informed of any problems encountered in implementing the controls or if GPC initiates changes to these controls.

Sincerely,

Original signed by:
Thomas M. Novak

Thomas M. Novak, Assistant Director
for Licensing
Division of Licensing

cc: See next page

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SURNAME ▶	MMiller/hmc	MDuncan	WHaass	EAdensam	TNovak		
DATE ▶	1/14/83	1/14/83	1/18/83	1/18/83	1/27/83		

VOGTLE

Mr. Doug Dutton, Vice President
Project Management
Georgia Power Company
P.O. Box 4545
Atlanta, Georgia 30302

cc: Mr. L. T. Gucwa
Chief Nuclear Engineer
Georgia Power Company
P.O. Box 4545
Atlanta, Georgia 30302

Mr. Ruble A. Thomas
Vice President
Southern Services, Inc.
P.O. Box 2625
Birmingham, Alabama 35202

Mr. J. A. Bailey
Project Licensing Manager
Southern Company Services, Inc.
P.O. Box 2625
Birmingham, Alabama 35202

George F. Trowbridge, Esq.
Shaw, Pittman, Potts and Trowbridge
1800 M Street, N.W.
Washington, D. C. 20036

Mr. D. O. Foster
Georgia Power Company
P.O. Box 4545
Atlanta, Georgia 30302

Mr. James P. O'Reilly
Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Mr. William S. Sanders
Resident Inspector/Nuclear Regulatory
Commission
P.O. Box 572
Waynesboro, Georgia 30830