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Power Generation Department



Georgia Power

The way forward electric system
NED-83-045

January 31, 1983

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
101 Marietta Street, NW
Atlanta, Georgia 30303

REFERENCE:
RII: JPO
Inspection Reports
50-321/82-36
50-366/82-34

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

The following information is submitted in response to Inspection Reports 50-321/82-36 and 50-366/82-34 concerning the inspection conducted by Mr. A. L. Cunningham of your office on November 30 and December 6, 1982. One apparent violation and one apparent deviation were reported:

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 SRB to ensure conformance of facility operation to all provisions of the Environmental Technical Specifications (ETS). ETS-3.2, Table 3.2-J, specifies the performance of an analytical program.

Contrary to the above, audits of the analytical program were not performed in 1980, 1981, and 1982, through December 6, 1982.

This is a Severity Level IV Violation (Supplement II).

RESPONSE

Admission or denial of alleged violation: The violation occurred.

Reason for the violation: The violation occurred because of the failure to fully develop and implement a formal program for accomplishing audits of those portions of the environmental program contracted to three vendors.

Corrective steps which have been taken and results achieved: Quality Assurance Audits have been scheduled for the three vendors. These audits will be completed by February 28, 1983. The audits will be documented and any open-items treated per existing audit controls.

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RESPONSE (Continued)

Corrective steps which will be taken to avoid future violations: The Quality Assurance Program has been corrected to specifically call out these audits on an annual basis. With the environmental program vendor audits included in the audit scheduling program, these audits will be accomplished on the required annual schedule.

Date when full compliance will be achieved: Full compliance will be achieved with the completion of the vendor audits by February 28, 1983.

DEVIATION

In a letter dated December 30, 1981, NRC Region II issued a Notice of Violation to the Georgia Power Company. The Notice identified a violation of Environmental Technical Specification 5.3.2.2, disclosed during NRC Inspection Nos. 50-321/81-24 and 50-366/81-24, for having failed to conduct audits of its analytical program. Georgia Power Company responded to the NRC citation in a letter dated December 30, 1981, describing certain corrective and preventive action taken or planned. The following statement was included in this letter:

By April 1, 1982, Georgia Power Company will develop a program to provide for annual QA audits of contractor activities related to the environmental monitoring. Implementation of this program will begin in April 1982.

Contrary to the above, as of December 6, 1982, the licensee had not developed a program to provide for annual QA audits of contractor activities related to the environmental monitoring.

RESPONSE

Corrective Actions

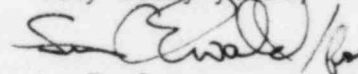
The Quality Assurance Program has been changed to specifically call out the environmental program vendor audits on an annual basis. Vendor audits have been scheduled and will be completed by February 28, 1983.

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RESPONSE (Continued)

The problem of failure to implement an identified commitment through full completion has been resolved by the development and staffing of the Regulatory Compliance department at Plant Hatch. This department began functioning (February 1982) after the commitments were made and these specific commitments were not tracked by Regulatory Compliance. Since February, one of the major responsibilities of this department is to track and monitor progress on NRC commitments. The current program is sufficient to preclude any future problems of this nature and no additional corrective actions are planned.

Very truly yours,



L. T. Gucwa
Chief Nuclear Engineer

/m
xc: J. T. Beckham, Jr.
H. C. Nix, Jr.
Senior Resident Inspector