

Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-3195

Mailing Address:
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 868-5581

September 25, 1990

the southern electric system

W. G. Hairston, III
Senior Vice President
Nuclear Operations

ELV-02126
0615

Docket Nos. 50-424
50-425

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

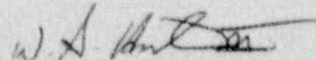
Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
REPLY TO A NOTICE OF VIOLATION

Pursuant to 10 CFR 2.201 Georgia Power Company (GPC) submits the enclosed information in response to a violation identified in Inspection Report 50-424/90-15 and 50-425/90-15 which concerns the inspection conducted by Mr. E. D. Testa of the NRC from July 30 - August 3, 1990. In the enclosure, transcription of the violation precedes GPC's response.

Please contact this office if you have any questions.

Sincerely,


W. G. Hairston, III

WGH, III/JLL/gm

Enclosure: Violations 50-424/90-15-01 and 50-425/90-15-01 and GPC Response

c(w): Georgia Power Company
Mr. C. K. McCoy
Mr. G. Bockhold, Jr.
Mr. R. M. Odom
Mr. P. D. Rushton
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebnetter, Regional Administrator
Mr. D. S. Hood, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

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ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2
NRC NOTICE OF VIOLATIONS 50-424/90-15-01 AND 50-425/90-15-01 AND GPC RESPONSE

"10 CFR Part 50.47(b)(16) requires that, responsibilities for plan development and review and for distribution of Emergency Plans be established and planners be properly trained.

10 CFR Part 50, Appendix E (G) requires that, provisions to be employed to ensure that the emergency plan, its implementing procedures, and emergency equipment and supplies be maintained up to date.

Technical Specification 6.7.1(d) requires that written procedures shall be established, implemented, and maintained covering the Emergency Plan implementation.

Procedures 00103-C, "Document Distribution and Control," 71002-C, "Controlled Document Distribution," 70408-C, "Controlled Document Distribution," and 40005-C, "Preparation and Control of Emergency Planning Documents" implement the control and distribution of the Emergency Plan and Emergency Plan Implementing Procedures.

Contrary to the above requirements, during the week of July 30 - August 3, 1990, multiple controlled copies of the Emergency Plan and Emergency Plan Implementing Procedure in the Technical Support Center (TSC), Operational Support Center (OSC), Emergency Operations Facility (EOF), and Simulator Control Room (SCR) were incomplete or had not been maintained in an up-to-date manner.

This is a Severity Level IV violation (Supplement VIII)."

RESPONSE TO VIOLATIONS 50-424,425/90-15-01

Admission or Denial of the Violation:

The violation occurred as stated.

Reason for the Violation:

As stated in the Notice of Violation, controlled copies of the Emergency Plan and the Emergency Plan Implementing Procedures (EPIPs) in the Technical Support Center (TSC), Emergency Operations Facility (EOF), Operational Support Center (OSC), and Simulator Control Room (SCR) were incomplete and not maintained in an up-to-date manner. The following causes, in combination, resulted in this violation:

1. Some plant personnel involved in the Site Area Emergency on March 20, 1990 removed documents from controlled emergency facility manuals for use as "working documents" while performing their assigned duties. This resulted in incomplete manuals in the emergency facilities.

ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2
NRC NOTICE OF VIOLATIONS 50-424/90-15-01 AND 50-425/90-15-01 AND GPC RESPONSE

2. Lack of attention to detail while updating manuals.
3. Posting of documents in emergency facility manuals was not performed in a timely manner.

Corrective Steps Which Have Been Taken and the Results Achieved:

1. A survey of all emergency facility documents was conducted to identify and correct discrepancies. The TSC, EOF and OSC discrepancies have been corrected.
2. A survey of the Emergency Plan and the Emergency Implementing Procedures in the SCR was conducted to identify and correct discrepancies. The SCR discrepancies have been corrected.
3. Plant personnel responsible for updating emergency facility manuals have been counseled on the importance of attention to detail.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

1. Surveys of the emergency facility documents will be conducted following all facility activations.
2. Surveys of the SCR documents will be conducted on a three month basis instead of a six month basis.
3. The frequency for posting documents in the emergency facility manuals will be increased from once per week to twice per week.

Date When Full Compliance Will Be Achieved:

Full compliance has been achieved in the TSC, EOF, OSC and SCR.