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Docket # 50-424-OLA
50-425-OLA
ASLBP # 90-617-03-OLA

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GEORGIANS AGAINST NUCLEAR ENERGY (GANE) RESPONSE
TO GEORGIA POWER'S SUPPLEMENTAL STATEMENT

Georgia Power is not fulfilling the requirement incumbent upon it to qualify bypassing the High Jacket Water Temperature switch on the Emergency Diesel Generator at Unit I of Plant Vogtle. It does not guarantee that an operator can handle the procedure that was previously handled automatically by the HJWT switch.

The most obvious flaw in their argument is their misreading of a statement by the EDG manufacturer (exhibit #6, paragraph #2) as evidenced by their amplified paraphrasing on page #2 of exhibit #4. Georgia Power added verbiage and meaning which cannot be taken from the manufacturer's letter. The worst-case (control room fire) average temperature rise of 2° per minute was calculated from that mistake.

It appears that Georgia Power assumes that a jacket water temperature of 200° would not be reached for 30 minutes at the reduced Nuclear Service Cooling Water flow rate. Georgia Power has not provided a suitable heat transfer calculation to verify the 2°F per minute rise. We believe the rate of rise under worst-case (control room fire) conditions would be substantially greater than 2°F per minute.

With a complete loss of jacket water cooling (such as the failure of the 3-way valve) the rate of temperature rise could be as high as 25°F per minute (FSAR, Sec. 2.2.6.).

Under these conditions, operator response time would be less than 30 seconds. Physical distance between the control room and the generator would prohibit even someone in a dead run reaching the generator in under two minutes.

In exhibit #1, FSAR, Sec. 9.5.5-5 (p. 13 of 16) it notes that the bypassed HJWT switch may be enabled for testing. Further, this procedure is **recommended** by the manufacturer in exhibit #9, Attachment to SG-9616. The frequent repositioning of these

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valves increases the probability of an operator valve positioning mistake.

Since the temporary license now requires that the HJWT switch be bypassed in emergency starts, this opening and closing of the solation valve could cause the P-3 Interlock to actuate. Should the P-3 Interlock System be in a trip state prior to an emergency start -- no automatic trip would be annunciated in the control room or even locally at the EDG. This further increases the confusion factor in case the diesel trips in an emergency and the operator assumes the HJWT switch is bypassed when indeed it is not.

Calibration drift is already shown to be an issue (NUREG 1410, 6-15) in the March 20, 1990, incident at Vogtle. Will the HJWT switch continue to be calibrated in case it becomes an issue following operator error in positioning the bypass valve after every test?

We are still concerned about operator training. For instance, in exhibit #14, item 4, NOTE:, vague language is used . . . "**may** require manual trip with USS (Unit Shift Supervisor) concurrence for high temperature conditions." If the actual temperature exceeds 200° by any amount, what basis will the operator use to determine if he/she should trip or not? And how are the people trained for that condition?

Exhibit #16, p. 8, #3, illustrates the probability for confusion and misunderstanding the **training itself** as well as an emergency situation.

Exhibit #3 also serves to illustrate the likelihood for an operator to miss a signal or an appropriate response. The operator will have to cope with a 98-page manual, possibly in the dark, with alarms sounding and lights flashing.

Will he/she have time to flip to page 51, and once there, how will he/she interpret "2.0/AUTOMATIC ACTIONS/Diesel will shut down"? Or "3.0/INITIAL OPERATOR ACTIONS/None"?

We maintain our earlier position that the HJWT switch must be fixed and retained as an automatic safety feature on the EDG at Vogtle.

We encourage Georgia Power to take immediate action to upgrade the pneumatic air system which could be the root cause of the foreign matter which undermines the performance of the HJWT

switch and compromises the reliability of the all-important emergency generator.

In addition, we suggest that Georgia Power connect Plant Vogtle to the on-site Plant Wilson, just in case all else fails.

Dated: December 10, 1990

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