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January 8, 1991

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THE GEORGIA POWER COMPANY
the southern electric system

ELV-02387
0771

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 50-424/90-28 and 50-425/90-28 which concerns the inspection conducted by Mr. B. R. Bonser of the NRC from October 27 - November 23, 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/PAH/gm

Enclosure: Violations 50-424/90-28 and 50-425/90-28 and GPC Response

c(w): Georgia Power Company
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ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2
NRC NOTICE OF VIOLATION 50-424/90-28 AND 50-425/90-28 AND GPC RESPONSE

"Technical Specification 6.7.1a requires that written procedures be established, implemented, and maintained covering activities delineated in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Revision 2, February 1978, delineates the types of safety-related activities that should be covered by written procedures and includes procedures for startup, operation, shutdown, and procedures for performing maintenance.

Procedure 24831-2, Reactor Trip and ESF Logic Response Time Test, Section 4.12, Restore To Service, provides the steps to restore the Solid State Protection System to service.

Procedure 54844-2, Train C TDAFW Pump Response Time Test and 2HS 5106A TADOT, provides instructions to measure the response time test of the Turbine Driven Auxiliary Feedwater Pump.

Contrary to the above:

1. On October 26, 1990, the licensee failed to follow procedure 24831-2, Section 4.12, in that steps specifying the removal of temporary jumpers installed on the SSPS slave relay contacts were performed out of sequence. The procedure required the restoration of blocks and the reset of ESF actuation signals, as necessary, prior to the removal of the jumpers. This resulted in several ESF components inadvertently changing position.
2. On November 8, 1990, the licensee failed to follow procedure 54844-2 in that steps specifying the connection of a recorder in the Auxiliary Relay Panel were performed out of sequence. This resulted in the inadvertent actuation of the TDAFW pump.

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

RESPONSE TO VIOLATION 50-424/90-28 AND 50-425/90-28

The following discussion applies to Item 1.

Admission or Denial of the Violation:

The violation occurred as stated in the notice of violation.

Reason For The Violation:

The root cause of this event was determined to be cognitive personnel error involving a failure to follow procedure. Procedure 24831-2, "Reactor Trip and ESF Logic Response Time Test," requires that the restoration steps be performed in sequence rather than in parallel. The removal of the temporary jumpers installed on the Solid State Protection System (SSPS) slave relay

ENCLOSURE (CONTINUED)

NRC NOTICE OF VIOLATION 50-424/90-28 AND 50-425/90-28 AND GPC RESPONSE

output contacts was performed out of the sequence specified by the procedure. Before removing these jumpers, the procedure required the technicians to request the Reactor Operator (RO) to restore blocks and reset ESF actuation signals as necessary. The technicians failed to request the RO to perform this step since they did not refer back to the body of the procedure in performing the restoration, but rather relied only on the restoration tables for guidance. Since the slave relays were still actuated as a result of performing the ESF logic response time test, the removal of the jumpers allowed the ESF signals to be sent to associated plant components.

A contributing cause was a misconception that positioning the SSPS output relay test panel "Mode Selector" switch to "Test" would prevent any spurious ESF signals from being generated.

Corrective Steps That Have Been Taken and The Results Achieved:

A review was conducted of the jumpers that were removed versus the components that operated. This review determined that all ESF components that should have operated under the existing plant conditions did in fact operate.

The technicians involved were counseled regarding their failure to follow procedure.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

1. Procedures 24831-1/2 will be revised to require technicians to initial off after performance of the steps for restoring blocks and resetting ESF actuation signals and to obtain the RO's signature.
2. Training will be provided to appropriate technicians and Operations personnel addressing the effects of the operation of the SSPS "Mode Selector" test switch on the SSPS slave relays and their outputs.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved with the restoration of the SSPS components.

Procedures 24831-1/2 are anticipated to be revised by 3-1-91.

Training of appropriate technicians and operations personnel addressing the operation of the SSPS Mode Selector Switch will be completed by 9-1-91, which is prior to performance of the next scheduled surveillance.

ENCLOSURE (CONTINUED)

NRC NOTICE OF VIOLATION 50-424/90-28 AND 50-425/90-28 AND GPC RESPONSE

RESPONSE TO VIOLATION 50-424/90-28 AND 50-425/90-28

The following discussion applies to Item 2.

Admission or Denial of the Violation:

The violation occurred as stated in the notice of violation.

Reason For The Violation:

The cause of this event was a failure to follow procedure. Procedure 54844-2, "Train C TDAFW Pump Response Time Test and 2HS 5106A TADOT," provides directions for recorder hook-up and contains prerequisites which would have prevented the recorder connection from causing the steam admission valve to open, had the procedure been explicitly followed. The duty engineer committed a cognitive personnel error by not ensuring the procedure was performed in sequence.

A contributing cause was a miscommunication between the Shift Superintendent and the Duty Engineer regarding an activity being conducted on the unit. The Shift Superintendent advised the Duty Engineer to perform procedure prerequisites and hook-up test equipment to permit the test as soon as plant conditions permitted; however, this generic guidance was interpreted by the engineer as allowing recorder hook-up out of sequence.

Corrective Steps That Have Been Taken and The Results Achieved:

Plant operators responded properly by shutting the steam admission valves which stopped flow to the steam generators.

The duty engineer involved with directing the performance of the procedure was counseled.

Appropriate personnel were reminded of the rules for performing procedures, including following steps in sequence unless deviations are allowed by the procedure.

A copy of Licensee Event Report 425/90-016 was placed in the Operations Reading Book to share lessons learned from this event.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

1. Procedure 54844-2 will be revised to add a warning that failure to follow steps in sequence may result in an ESF actuation.

Similar procedures will be reviewed and revised as necessary. This will be done by 1-15-91.

ENCLOSURE (CONTINUED)

NRC NOTICE OF VIOLATION 50-424/90-28 AND 50-425/90-28 AND GPC RESPONSE

2. Plant management has identified a weakness in the area of procedural compliance and steps will be taken in the upcoming year to improve performance in this area.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved with the restoration of the TDAFW pump.

Procedure 54844-2 and similar procedures will be reviewed and revised as necessary. This action is anticipated being completed by 1-15-91.