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Georgia Power

the southern electric system

C. K. McCoy
Vice President, Nuclear
Vogtle Project

July 21, 1994

LCV-0370-D

Docket Nos. 50-424
50-425

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

Ladies and Gentlemen:

**VOGTLE ELECTRIC GENERATING PLANT
REPLY TO A NOTICE OF VIOLATION AND PAYMENT OF
PROPOSED IMPOSITION OF CIVIL PENALTY**

Pursuant to 10 CFR 2.201, Vogtle Electric Generating Plant (VEGP) submits the enclosed information and check in the amount of \$25,000 in response to a notice of violation and proposed imposition of civil penalty. The violation was identified during an inspection conducted from April 24 - May 12, 1994, described in Inspection Reports 50-424,425/94-15, and discussed with NRC Region II at an Enforcement Conference on June 2, 1994.

Should you have any questions, please contact this office.

Sincerely,

C. K. McCoy

CKM/AFS/WCG

Enclosures: Reply to NOV 50-424,425/94-15 and \$25,000 check.

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for \$25,000.00.

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U. S. Nuclear Regulatory Commission

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xc: Georgia Power Company
Mr. J. B. Beasley
Mr. M. Sheibani
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

ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT - UNIT 1 REPLY TO A NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424;425/94-15

The following is a transcription of the violation as cited in the Notice of Violation (NOV):

"10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," requires, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations and nonconformances are promptly identified and corrected.

Contrary to the above, from March 1 to April 24, 1994, the licensee did not promptly identify and correct conditions adverse to quality. This resulted in deenergization of the Piping Penetration Area Filtration and Exhaust System (PPAFES) train "A" and "B" exhaust dampers, 1PV-2550B and 1PV-2551B, respectively, and the exhaust function of the PPAFES remaining in a disabled condition for an extended period of time during unit operation in Mode 1. The failure to promptly identify and correct conditions adverse to quality is evidenced by the following examples:

- a. During preparation of clearance 19400134, dated March 1, 1994, the operation work planner did not identify a condition adverse to quality in that he failed to identify that drawing 1X30-AA-F04A (*1X3D-AA-F04A*) and load list 1X30-AA-M01C-1BYC1 (*1X3D-AA-M01C-1BYC1*) for train "B" indicated that the breaker utilized by the clearance to isolate the Electrical Penetration System Filtration System, i.e., breaker 1BYC1-28, also supplied power to PPAFES exhaust damper 1PV-2551B.
- b. On March 1, 1994, the independent verification performed by the Support Shift Supervisor for clearance 19400134 failed to identify a condition adverse to quality in that he did not identify that breaker 1BYC1-28 supplied power to PPAFES exhaust damper 1PV-2551B.
- c. Between March 1, 1994 and April 24, 1994, during multiple tours of the control room panel containing the position indication for PPAFES exhaust dampers 1PV-2550B and 1PV-2551B, licensed operators failed to identify a condition adverse to quality in that the position indications for both dampers were not illuminated, which indicated that the dampers were shut, a condition that rendered the dampers inoperable.

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- d. During a surveillance test conducted on March 15, 1994 for train "A", in accordance with operations procedure 14515-1, Piping Penetration Area Filtration and Exhaust System Operability Test, licensed operators failed to identify a condition adverse to quality in that during checks required by procedure 14515-1 to verify the position of damper 1PV-2550B, they did not identify that the position of the damper 1PV-2550B was incorrect. Further, during a similar surveillance test conducted on March 28, 1994, for train "B", although licensed operators identified that the position indications for damper 1PV-2551B were not operable, they failed to take prompt corrective action to address this condition adverse to quality.
- e. On April 20, 1994, during review of the completed work package for MWO 19401858, the Shift Supervisor failed to identify a condition adverse to quality in that he did not recognize that dampers 1PV-2550B and 1PV-2551B were deenergized and closed.

These failures to identify, correct, and document these conditions adverse to quality resulted in disabling the exhaust function of both trains of PPAFES, which is required to operable by Technical Specification 3.7.7, for approximately 54 days (01013).

This is a Severity Level III violation (Supplement I).
Civil Penalty - \$25,000"

RESPONSE TO VIOLATION (50-424;425/94-15-01)

Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

Reason for the Violation:

Georgia Power Company (GPC) has concluded that a single line diagram and electrical load list failed to specifically identify by equipment number that the train A exhaust damper was a device being powered from the affected circuit breaker. The single line diagram and electrical load list identified other dampers and an HVAC panel as devices being fed from the circuit breaker which was deenergized on February 28, 1994. However, the train A exhaust damper was also being fed from this circuit breaker via the HVAC panel.

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Additionally, GPC has concluded that a cognitive personnel error and lack of attention to detail by the operations work planner and the support shift supervisor (SSS) resulted in an inadequate review of the circuit breaker clearance associated with the design change on the train B components. The operations work planner's and SSS's reviews did not find the PPAFES train A exhaust damper on the appropriate breaker drawing or its respective load list because it was not listed on these documents. The PPAFES train B exhaust damper was shown on its respective drawing and load list, but these were not adequately reviewed since the train A and train B clearances were being developed at the same time.

The purpose of the monthly surveillance is to operate the system to prevent moisture buildup on the filter. This monthly surveillance contains no acceptance criteria related to proper exhaust damper operation, and procedural guidance for checking status of the exhaust damper was unclear. However, the monthly surveillance did provide opportunities to identify the clearance error.

GPC has also concluded that subsequent personnel errors committed during performance of surveillance testing and investigation of the damper position indication discrepancy prevented the early detection and correction of the clearance error.

Corrective Steps Which Have Been Taken and the Results Achieved:

1. Power was immediately restored to the exhaust dampers on April 24, 1994, following discovery of the clearance error impact on the exhaust dampers.
2. The appropriate Unit 1 and Unit 2 single line diagrams and electrical load lists, which failed to identify by equipment number that the Train A PPAFES exhaust damper was being powered from the circuit breaker, have been corrected.
3. The individuals involved have been counseled on the significance of configuration control when preparing, reviewing, and approving clearances, and timely identification of abnormal equipment status indications.
4. The PPAFES monthly surveillance and system operating procedures have been revised to provide clearer guidance on verifying exhaust damper operation.
5. The operations work planners and system engineers have been provided training regarding this event, with emphasis on configuration control.
6. An evaluation of the exhaust damper portion of the system for possible improvements has been completed.

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7. Operations surveillance procedures have been reviewed and appropriately revised to ensure that similar equipment status problems have been corrected.
8. Licensed operators reviewed this event in their continuing training with particular instruction on configuration control. Emphasis was given on utilizing a questioning attitude when observing equipment status indicators.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

An initial sample review of other breakers that power similar loads revealed no further drawing problems. An additional review will be completed by September 1, 1994.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on April 24, 1994, when power was restored to the PPAFES exhaust dampers thereby rendering them operable.