

Southern Nuclear Operating Company
Post Office Box 1295
Birmingham, Alabama 35201
Telephone (205) 877-7437



Southern Nuclear Operating Company

The Southern Electric System

George Bockhold
General Manager
Nuclear Technical Services

August 5, 1994

Mr. James Lieberman
Director, Office of Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: GEORGIA POWER COMPANY
Vogtle Electric Generating Plant, Units 1 & 2
Docket Nos. 50-425/50-425
License Nos. NPF-68/NPF-81
EA94-037

**RESPONSE TO DEMAND FOR INFORMATION
REGARDING GEORGE BOCKHOLD, JR.**

I, George Bockhold, Jr. file this Response to the Demand for Information dated May 9, 1994. I appreciate the opportunity to address the questions posed. I would respectfully request that my responses be considered by the Nuclear Regulatory Commission in determining that no further action is necessary to restrict my participation in NRC licensed and regulated activities. Portions of my responses are based on information submitted in pending license amendment proceedings regarding Plant Vogtle (Atomic Safety and Licensing Board 93-671-01-0LA-3.)

I have tried to be open and candid throughout my career. My experience at the United States Naval Academy has left an indelible conviction that candor and honesty are a way of life. While I acknowledge that every human is capable of making mistakes, I have tried to conduct my affairs with openness and candor. I believe that the information which I submit to the Nuclear Regulatory Commission will indicate that I did not act with careless disregard or indifference to regulatory requirements.

My specific responses to Paragraphs A,B,C,D,E,F,G and H are as follows:

170038
9408180154 940805
PDR ADOCK 05000424
P PDR

IEIA
111

Mr. James Lieberman
August 5, 1994
Page 2

Paragraph A:

"A description of Mr. George Bockhold, Jr.'s current position and responsibilities."

Response:

I am currently employed by Southern Nuclear Operating Company, Inc. (Southern Nuclear) as General Manager, Nuclear Technical Services. My responsibilities include corporate support for work control reengineering, associated with Plants Farley, Hatch, and Vogtle, advanced reactor activities and other special projects. The reengineering responsibilities include major process improvements and organizational changes for approximately 1200 employees involved with work activities at these three plants. Advanced reactor responsibilities include the implementation of Southern's Strategic Plan to maintain a leadership role for new nuclear generation, including managing and being involved with diverse industry interests (ARC, EPRI, Vendor Design Teams, NEI, INPO and NRC.) I report to Mr. Louis B. Long, Vice President, Technical Services, Southern Nuclear.

Paragraph B:

"An explanation of why, notwithstanding his knowledge of the NRC's interest in DG reliability and the importance of information on this issue to an NRC decision on restart, Mr. Bockhold failed to take sufficient steps to ensure that information presented to the NRC in the April 9, 1990 presentation and letter regarding DG reliability was accurate and complete."

Response:

Let me assure you that my actions in 1990 were designed to provide both accurate and complete information to the NRC. A fair evaluation of anyone's performance has to begin with an analysis of the historical setting in which the performance is to be judged. Accordingly, the presentation to the NRC Region II in Atlanta on April 9, 1990 and the letter to the NRC of the same date needs to be reviewed in light of the events surrounding those questioned activities.

On March 20, 1990, a Site Area Emergency (SAE) was declared at Georgia Power Company's Vogtle Electric Generating Plant (VEGP) in Waynesboro, Georgia. At the time of the SAE, I was the General Manager of VEGP, responsible for the safety of 1150 employees and the public, including the community of Waynesboro. As General Manager, it was necessary and proper to delegate assignments and responsibilities for different activities. Similarly, it was reasonable, as General Manager, to rely on the information received from subordinates in response to delegated assignments. The delegation of assignments and reliance on other employees is a normal day-to-day occurrence in any industry. The SAE was a challenge and required an even greater delegation of assignments and reliance on information received by me. The SAE required VEGP personnel to focus on numerous important

Mr. James Lieberman

August 5, 1994

Page 3

issues that needed to be addressed in adequately investigating the event. Technical reviews needed to be conducted in the many areas: truck and vehicle access to the switch yard; off-site emergency notification; personnel accountability during emergency events, communication difficulties between the site and corporate office; loss of core cooling capabilities during the loss of off-site power due to reduced water inventories as a result of planned outage activities; and diesel generator performance. On March 23, 1990, the NRC issued a Confirmation of Action Letter (CAL) to Georgia Power Company (GPC) that confirmed that GPC would not return VEGP Unit 1 to criticality until the Regional Administrator was satisfied that appropriate corrective action had been taken and that the plant could safely return to power operations.

The sheer number of these tasks and the preparation of a presentation required the General Manager to delegate responsibilities and to rely on the responses supplied by his staff. An analogous situation is the NRC's reliance on delegated responsibilities that were given to the Augmented Inspection Team (AIT) and to the Incident Investigation Team (IIT.) In all these cases, as managers, we rely on co-workers who we view as competent and knowledgeable.

As General Manager, I had to use my staff to provide me with the level of detail to be adequately informative. There is simply no other way I could have addressed or accomplished these functions or tasks without delegation and reliance on staff personnel. I did so by assigning several VEGP employees, who were familiar with specific issues, to assist in my preparations and to provide information to the NRC.

In preparation for the April 9, 1990 meeting with the NRC, I assigned a senior member of the Event Critique Team, a degreed SRO licensed superintendent, Mr. Cash to provide me with the supporting diesel generator data for the meeting. In my opinion, it was reasonable for me to expect that Mr. Cash would use special care and be sure that the information that he provided was accurate for this important meeting. I instructed Mr. Cash to review the logbooks and determine how many consecutive successful diesel generator starts had been made with no significant problems. It was reasonable for me to delegate this assignment to a staff member of Mr. Cash's experience and training.

I believed that Mr. Cash did understand his assignment. He did not give any indication to me that there would be, or had been, any difficulties in obtaining the requested information. Additionally, the number of consecutive successful starts was not known to me when I requested that Mr. Cash count consecutive successful starts. The details regarding the DG starts was not information which I had. Again, this level of detail (i.e., a number) was not something I would have known, given my overall responsibility for the plant (including SAE recovery, day-to-day oversight and ITT interface.) I was definitely aware of the general activities of testing and was briefed on the testing status contemporaneous with those events. I was very aware of the fact that there had been numerous DG starts, but an exact number was beyond my knowledge. Accordingly, my reliance on Mr. Cash's work product was both reasonable and normal under the circumstances.

Mr. James Lieberman

August 5, 1994

Page 4

In conjunction with receiving information from Mr. Cash, and others, I had numerous transparencies prepared for use at the April 9, 1990 meeting in Atlanta. Mr. Cash assisted by obtaining the "start counts." Mr. Cash knew that the transparency and his count numbers were for the presentation to the NRC. Yet, during the transparency preparation, Mr. Cash never notified me that he had any problems obtaining the diesel generator start count numbers.

I adequately specified the starting point for diesel counts. My belief is supported by affidavits with the following responses which were provided to the NRC. "Mr. Cash recalls that he understood Mr. Bockhold wanted him to count starts without significant problems, where the diesel had started properly and reached the required voltage and frequency. Mr. Cash interpreted "significant problems" to be anything which would have prevented the diesel from operating in an emergency." "Messrs. Cash, Bockhold, McCoy and Hairston believed and expected the NRC personnel at the meeting [April 9, 1990] to understand that the 18 and 19 successful starts were consecutive successful starts." Although I do not remember the specific terminology that I used when I tasked Mr. Cash, Mr. Cash's recollection supports my firm belief that the tasking was adequate for Mr. Cash to count consecutive successful diesel starts. Since I knew that the 1B diesel had start problems during overhaul, I did not have to specify or know the specific start number, date or time that Mr. Cash started his count. It was logical for me to believe that the troubled starts would be excluded from the number Mr. Cash gave for my presentation. And, based on my recollection, my testimony to OI in August, 1990, and my review of April 19, 1990 conversations, at the time I knew his diesel count starting point was after overhaul and prior to sensor calibration and logic testing. Finally, this knowledge was consistent with the diesel testing transparency presented at the April 9, 1990 meeting which showed all the 1B special testing associated with successful starts after sensor calibration and logic testing.

The April 9, 1990 presentation was intended to demonstrate that the Vogtle Unit 1 diesel generators were operable and that Unit 1 could be permitted to restart. Because there was some concern about the reliability of the CALCON sensors, GPC's presentation showed that diesels had been started a significant number of times in succession without any problems or failures. In other words, a number of starts would demonstrate that the successful operability test ("also called a surveillance") was not a fluke. I never intended the number of diesel starts to relate to the diesel generator valid tests as the term is used in the NRC Regulatory Guide, since the starts largely occurred prior to the time the diesels were declared operable and the April 9, 1990 presentation showed many diesel run tests before the diesels were declared operable. While the number of starts were relevant to the issue of diesel operability, it was not significant to me whether there were nineteen or twelve starts for the 1B DG. I observe that GPC and NRC personnel reached the same conclusion - the diesels were operable and the unit could be safely returned to service, even with some lesser numbers of starts for the 1B DG. Responses before the Atomic Safety and Licensing Board given by NRC staff (P. Skinner and O. Chopra) support my observations and similarly, the OI Report of Interview with Milton D. Hunt. A significant number, a total of at least thirty successful starts on essentially identical diesels, coupled with surveillance tests and other special testing provided sufficient evidence that the diesels

Mr. James Lieberman
August 5, 1994
Page 5

met NRC regulatory operability/reliability requirements. The NRC staff supported this position at the time.

It is unfortunate that Mr. Cash made an unintentional mistake in counting diesel starts, by including starts which were not indicative of operability/reliability diesels. However, if Mr. Cash had provided me with twelve successful starts for the 1B diesel, the twelve starts for the 1B diesel would have been presented at the April 9, 1990 meeting. Again, I viewed it, the operability/reliability determination was not dependent on the number of successful starts of nineteen for the 1B diesel. Twelve would have been fine to convey my intended message.

Further, as documented by the IIT transcripts, I, NRC regional and IIT staff, and NRC management were aware of 1B diesel starts with problems, because we had frequent discussions concerning diesel problems coming out of overhaul. The safety-significant problems of concern were the diesel engine instrumentation. The presentation I made to the NRC on April 9, 1990 included a transparency containing 1B diesel instrument problems, specifically instruments that were quarantined, some associated with "problem" starts. I was prepared to discuss these "problem" starts.

The April 9, 1990 letter was based on the same information provided in the transparencies. Accordingly since I relied on the information provided by Mr. Cash, I have the same position relative to the April 9, 1990 letter.

In summary I reasonably relied upon a senior member of the event critique team, a degreed SRO licensed unit superintendent, to provide me with the required data concerning successful diesel generator starts. There was no indication at the time that the information given to me was inaccurate or incomplete. Accordingly, I did take reasonable steps to ensure the information presented to the NRC in the April 9, 1990 meeting and letter were accurate to the best of my knowledge at that time.

Paragraph C

"An explanation of why, notwithstanding his lack of a sound basis for agreeing that the term CTP was adequate to convey what he intended (i.e., that the DG start count being used as the basis for the April 19, 1990 LER began after testing of the DG control systems that did not require diesel starts,) Mr. Bockhold allowed this language to be included in the April 19, 1990 LER."

Response:

The terms "the *control systems* of both engines have been subject to a comprehensive test program" are a subset of the term CPT as used in the Notice of Violation. The LER's terms do convey what I intended. Therefore, I reasonably allowed these terms to be included in the April 19, 1990 LER.

Mr. James Lieberman

August 5, 1994

Page 6

On April 19, 1990, I continued to believe that Mr. Cash had taken special care to be sure that the diesel count information was accurate. I did not know that the other individuals might interpret the LER language different than what I view as the plain syntax of the English language. My staff (Mr. Aufdenkampe) had told me that his people were verifying the diesel count for the LER. Based on this information, I had reasonable basis to agree to the use of this language in the April 19, 1990 LER. If Mr. Aufdenkampe's group (Technical Support) found the data lacking, established practice would be for that group to change the language or to contact more senior managers for assistance. Further, today if you examine all the facts, I believe that the LER language is correct for diesel counts as of April 19, 1990, but could be confusing to individuals who were not knowledgeable of diesel testing activities.

I view the 10 day period from April 9 to April 19, 1990 as the critical startup period after the SAE. During this period, I focused first on safety (hour-by-hour, and day-by-day) of the plant, and then on efficient operation. I did not allow LER preparation to dilute my main responsibilities associated with plant safety because, by practice, I could rely on my staff to accurately prepare the LER. Even then, I did review the LER for accuracy. An example of my focus was that I ordered extra diesel surveillance testing beyond that required by Technical Specifications to ensure diesel operability/reliability. I did hear a limited amount of appropriate questioning conversation concerning the LER preparation, but I did not hear that Mr. Cash's count was wrong before the submittal of the April 19, 1990 LER. An example of the type of conversation that I heard was "maybe the counts should be revised upward" to reflect that the diesels had been started during the 10 day period between April 9 and 19. Additionally, the language in the April 19, 1990 LER did not have to rely on a new diesel count because the terms "at least" were used. I relied upon the normal process, my staff, for LER preparation. This process required the people responsible for crafting the LER language to understand and/or communicate with the technical experts who provided the data and technical details, and required PRB review and only then General Manager approval. Mr. Aufdenkampe indicated to me that the normal LER process was being followed by specifically saying that his people were verifying the diesel count numbers. The NRC will observe, in reviewing taped conversations, that the normal process did continue, but with less than clear results. Since the LER covered the entire SAE, the facts associated with diesel starts were only a small portion of the LER. I still expected that diesel count language would be consistent with Mr. Cash's count because I had no reason to believe that Mr. Cash's count was wrong.

I believed that the count Mr. Cash made (consecutive successfully starts without significant problems) was after the problems that the 1B diesel had coming out of the overhaul period. I knew that the 1B diesel had problems before the diesel *control system logic testing*. The LER language (a subset of the NRC term CTP) "After the 3-20-90 event, the *control systems* of both engines have been subject to a comprehensive test problem. Subsequent to this test problem, DG1A and DG1B have been started at least 18 times each and no failures or problems have occurred during any of these starts." was used to convey the same message that was contained in the diesel transparencies used at the NRC April 9, 1990 meeting. The preceding LER language did convey the message that I wanted to convey at the

Mr. James Lieberman
August 5, 1994
Page 7

time on April 19, 1990. However, I also expected that those responsible for LER facilitation would either confirm the language statement or seek further management direction.

It is not reasonable, in context, to interpret that the preceding LER language was associated with the first successful test to demonstrate operability. The language simply does not say this. The transparency used during the April 9, 1990 meeting shows "Diesel Operable" near the end of the testing. Furthermore, conversations recorded on April 19 clearly show that my understanding of Mr. Cash's work product was shared with other managers. If the language was indicative of operability, even these managers missed that implication. On April 19, 1990, I did not know that other individuals might interpret the LER language different than the plain syntax of the English language, therefore, I had reasonable basis to agree to the language in the LER. As I viewed it, we were making clearer the April 9 statement. The language did specify what I intended at that time and other GPC personnel associated with the LER preparation also had my, or a similar, understanding of the language's meaning.

Paragraph D:

"An explanation of why, notwithstanding his knowledge that questions had been raised regarding the accuracy of the DG start information and his knowledge of the informal means by which the data he was relying on was developed, Mr. Bockhold failed to take sufficient steps to ensure that information included in the April 19, 1990 LER was complete and accurate."

Response:

I believe that I did take reasonable and appropriate steps to ensure that information presented to the NRC in the April 19, 1990 LER was accurate to the best of my knowledge at the time because of the following:

1. I continued to believe that Mr. Cash had taken special care to be sure that the diesel count information was accurate, and represented consecutive successful starts without problems or failures.
2. I knew that before logic testing for the 1B diesel there had been problems and failures, and after logic testing, we had conducted a significant number of consecutive successful starts of the 1B diesel generator.
3. I knew that additional consecutive successful starts were being accumulated on the diesels. I had ordered these starts.

Mr. James Lieberman

August 5, 1994

Page 3

4. I did hear a limited amount of appropriate questioning conversation concerning the LER preparation, but did not hear that Mr. Cash's count was wrong before the submittal of the April 19, 1990 LER.
5. My staff (Mr. Aufdenkampe) had told me that his people were verifying the diesel count for the LER.
6. I shared my understanding of Mr. Cash's count data with others involved in the LER verification process. They did contact Mr. Cash and, unbeknown to me, were provided explanations at odds with my understanding.

Considering the above, I believe there was a reasonable basis to agree to the language included in the April 19, 1990 LER. I was not aware that the data developed by Mr. Cash was uniquely informal, quickly assembled or informally reported.

I did hear a limited amount of appropriate questioning conversation concerning the LER preparation, but I did not hear that Mr. Cash's diesel count was wrong before the submittal of the April 19, 1990 LER. The questions that I heard did not raise sufficient concern for me to take special action to modify the normal LER process. LER preparation personnel and their supervision, including the Acting Assistant General Manager responsible for this function, (Mr. Mosbaugh) were responsible for crafting accurate LER language. By understanding and/or communicating with technical experts who provide the data and technical details, this LER group has full flexibility to obtain supportive, confirming information or to revise LER language. Any person in the process could have and should have raised questions to Mr. Cash if they had concerns about the accuracy of the LER diesel count information. All personnel had an obligation to stop the normal LER process if any individual believed that the data was not correct. Further, Mr. Aufdenkampe indicated to me that the normal LER process was being followed.

As indicated previously, I was not aware that the data developed by Mr. Cash was uniquely informal, quickly assembled or informally reported. To the contrary, my impression was that he had expended diligent efforts and was qualified to make the count. I believed that a senior degreed SRO licensed Unit Superintendent would treat the data that he provided the General Manager for an important NRC meeting with special care and he would be sure that it was accurate. This is even more reasonable in that this was a narrow task assigned and either should have been easily performed or clarification requested. Therefore, on the April 19, 1990 phone call, I remained convinced that Mr. Cash's data was correct and in that conversation expressed my conviction by using the terms "verified correct by the Unit Superintendent who went through the logs." I was not aware of implications that other members of GPC may have drawn from these terms.

In hindsight, I acknowledge that on April 19, I likely should have followed up on more specific tasking of Mr. Mosbaugh and Mr. Aufdenkampe to complete their verification of diesel counts. The

Mr. James Lieberman
August 5, 1994
Page 9

mere fact that members of my staff had to ask me about the diesel count information indicates that maybe they were not carrying out their duties to verify the count information. In short, I take responsibility for the faults of our verification efforts because, in hindsight, I might have missed indications of the possibility of failure. I do believe, however, that others were in a much better position to impact the LER submitted to the NRC.

Paragraph E:

"An explanation of why, notwithstanding his review of the June 29, 1990 letter, which stated that it would clarify the April 9, 1990 letter, Mr. Bockhold failed to ensure that the June 29, 1990 cover letter clarified the April 9, 1990 letter."

Response:

Today, I believe that, for the purpose of 10 C.F.R. 50.73, the syntax of the June 29, 1990 cover letter and LER does clarify information associated with both the April 9, 1990 letter and the April 19, 1990 LER. However, the June 29, 1990 cover letter and LER do not address the issues associated with Mr. Mosbaugh's allegations or the subsequent investigations. On that basis, the letter could be confusing to an NRC investigator reviewing these allegations. The June 29, 1990 cover letter and LER does clarify and provide additional information associated with diesel operability/reliability (a purpose of the April 9, 1990 letter) and identifies additional start failures associated with the 1B diesel including referencing the Technical Specification Special Report 1-9-4. Therefore, for the stated purpose of the letter, 10 C.F.R. 50.73 reporting, the June 29, 1990 cover letter and LER does clarify the April 9, 1990 letter.

I was not directly responsible for the preparation of the technical details supporting the June 29, 1990 cover letter or the preparation of the letter. On April 30, 1990, Mr. Mosbaugh gave me a listing of 1B DG starts, which showed that the start count reported in the April 9 presentation were incorrect. When I was presented with the conflicting data, I directed Mr. Mosbaugh to obtain the correct information and prepare the appropriate documentation to be sent to the NRC and correct the previously filed documents. During May, 1990, the plant staff had problems developing a clear diesel count, and in early June, I was informed that this job was assigned to the Supervisor of SAER. The SAER group (our QA group) had complete independence from the plant staff as they reported directly to a corporate manager reporting to the VEGP Vice President. The corporate organization and their supervision were responsible for the message contained in the June 29, 1990 cover letter and completeness of the letter. I was not aware of the discussions that Mr. Mosbaugh had with members of my staff and/or the Plant Review Board. I did expect my staff, including the Plant Review Board, to review the June 29, 1990 cover letter considering their knowledge and recommend revisions as were appropriate. My personal review was for accuracy based upon my recollection of the facts associated with diesel starts. In addition, I strongly feel that it is appropriate that a QA organization should be able to present its findings and conclusions with an appropriate degree of independence from the

Mr James Lieberman
August 5, 1994
Page 10

organization that has been audited, in this case namely the VEGP General Manager and his staff. Therefore, I relied upon the corporate organization to appropriately present their findings consistent with my personal knowledge. Since earlier GPC had notified the NRC that we had made an error in counting diesel starts, I interpreted the June 29, 1990 cover letter to mean that in the April 9, 1990 letter and the April 19, 1990 LER, we should have had more clarity of terminology, so that better communication between GPC and NRC would result (i.e. "more useful information.") Therefore, the plant should have reported additional count information based on diesel generator operability tests. Further, at that time, I believed that the letter was indicating that a cause of Mr. Cash's count error (an incorrect number) was that he had difficulty in interpreting our logs, in other words difficulty due to our record keeping practices and the information available to him.

In summary, I relied upon corporate staff, including the SAER organization, to conduct a complete audit and craft the language in the June 29, 1990 cover letter, and my personal review was for accuracy based upon my recollection of the facts. I also relied upon my staff including the Plant Review Board, to identify any inconsistencies. I believe the June 29 letter was accurate relative to all of our knowledge at the time. Specifically, the June 29, 1990 submittal does clarify prior statements and provides additional new information concerning significant safety items associated with diesel operability/reliability (a purpose of the April 9, 1990 letter) by identifying additional start failures associated with the 1B diesel (including referencing the Technical Specification Special Report I-90-94.) Further, at the time, I believed that the letter was indicating: first, that a cause of Mr. Cash's count error was that Mr. Cash had trouble with our record keeping practices in the preparation of his diesel count information, and second, the VEGP General Manager and his staff should have done a better job in the preparation and review of the April 9, 1990 letter and April 19, 1990 LER by providing more information about starts associated with operability. Additionally, since my immediate supervisors, Mr. McCoy and Mr. Hairston, had direct involvement in the preparation of this submittal and separate discussions with NRC management about diesel information, I also believed that the submittal addressed NRC concerns from their perspective.

Paragraph F:

"An explanation of why, notwithstanding his knowledge that the Unit Superintendent was not confused about the distinction between successful starts and valid tests when the Unit Superintendent collected start data for the April 9, 1990 presentation and letter, Mr. Bockhold allowed the information to be included in the August 30, 1990 letter as one of the reasons for the error in the April 9, 1990 letter."

Response:

I believe that the syntax of the August 30, 1990 letter is correct today. Some NRC personnel and GPC personnel were confused with the terminology of "successful starts." This terminology originated in the preparations for the April 9, 1990 presentation, and therefore was one of the reasons for the

Mr. James Lieberman
August 5, 1994
Page 11

confusion. Thus, NRC conclusions contained in DFI section III, page 9, are not correct, because the confusion was relevant to the April 9, 1990 letter. The language of the August 30, 1990 letter is misquoted in the Notice of Violation and cannot reasonably be construed as identifying one of the causes of the error in the April 9, 1990 letter as Mr. Cash's confusion.

At the time, I did not know that the NRC wanted us to provide additional information about root cause of the errors by investigating my and Mr. Cash's performance. Additionally, since both I and my immediate supervisor, Mr. McCoy had direct involvement in discussions with NRC management about the information that the NRC wanted, I also believed that the submittal addressed NRC concerns from Mr. McCoy's perspective. Finally, any additional GPC concerns about the August 30, 1990 letter were resolved when the PRB unanimously agreed to the letter wording. As with prior correspondence, this letter addressed what I understood as the relevant issue (start information) and was accurate and complete for that purpose.

Paragraph G:

"An explanation of the corrective actions taken, or planned by the Licensee to address Mr. Bockhold's performance failures."

Response:

As explained in the preceding, I believe that I acted in a reasonable fashion as the VEGP General Manager.

During May, 1990 the NRC expressed some perceived concerns about VEGP personnel. Instead of denying these perceptions, I accepted responsibility for implementing corrective action to earn a change in adverse NRC perceptions of VEGP. On May 8, 1990 Mr. McCoy and I met with the managers of the plant and openly discussed the NRC's concerns. I recognized and discussed my own natural communications style including short comings associated with my management style. Attachment 1 is the outline that I used to conduct this discussion. Specifically, I stated that while I believe I consider all aspects of a problem I do make decisions quickly and sometimes in too forceful of a communication style. I stated that I must allow time for all aspects of a problem to be aired and to make sure that people I interface with feel that they have an opportunity to fully express their opinions. I have learned a valuable lesson from this experience. I believe that my performance over the past several years has reflected this lesson learned.

Upon reflection, I believe that if I had the foresight to include both the number of valid diesel tests and "successful starts" in the April 9, 1990 presentation, then the confusion associated with this matter would have been mitigated or eliminated. My April 9, 1990 presentation did show that the diesel test ("surveillance") that we used to declare the diesels operable were completed late in the test program, but the presentation did not specifically list the number of valid diesel tests.

Mr. James Lieberman
August 5, 1994
Page 12

Recently, the Senior Vice President of GPC and my immediate supervisor met with me and reviewed my actions and responsibilities which are the subject of the NOV and the DFI. This review focused on the mistakes made by my organization and my personal performance failures to assure that all my responsibilities, including delegated responsibilities, were carried out without violation of NRC regulations. This review also addressed ways to improve my management capabilities. I view this review as a learning experience to continue to learn from my mistakes and mistakes of others and to implement lessons learned in a safe, professional, and responsible manner.

I have and will continue to the best of my ability to conduct licensed activities in accordance with all NRC requirements and continue to work on improving my management capabilities.

Paragraph H:

"Given the four violations of NRC requirements, an explanation as to why NRC should have confidence that Licensee, with the involvement of Mr. Bockhold, will in the future conduct licensed activities in accordance with all NRC requirements, including the requirements of 10 C.F.R. 50.9, completeness and accuracy of information."

Response:

As explained in the preceding, I believe I acted in a reasonable fashion as the VEGP General Manager and I will always strive to provide complete and accurate information to the NRC and will continue to work on improving my management style. Therefore, the NRC should have confidence in my involvement in licensed activities in the future.

Since my receipt of the Demand for Information, I have reflected long and hard on my actions in 1990 and my capabilities and weaknesses. In hindsight, my strengths as a manager (e.g. delegation to competent individuals of specific tasks, reliance on the work product of subordinates, conviction in my recollection of events and decision-making ability) became weaknesses. I am honestly concerned that the NRC believes that sufficient indicators were available to me to have, in real time, changed the course of events. I respectfully request the NRC to ask the question: based on events as they unfolded and not based on hindsight, would a prudent manager in the same or similar position be reasonably expected to have foreseen the deficiencies and failures identified in the Notice of Violation? I simply do not believe that he or she would have foreseen these results. Moreover, my efforts throughout this time were directed at assuring that both GPC and the NRC managers had all the correct material information necessary for them to be as knowledgeable as they could be, so that decisions made were informed decisions which assured nuclear safety.

Mr James Lieberman
August 5, 1994
Page 13

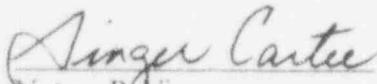
In conclusion, I have and will continue to the best of my ability to conduct licensed activities in accordance with all NRC requirements and continue to work on improving my management capabilities. The foregoing is true and correct based on my knowledge and belief.

Very respectfully,



George Bockhold, Jr.

Sworn to and subscribed
before me this 5 day
of August, 1994.



Notary Public

My Commission expires:
MY COMMISSION EXPIRES JANUARY 12, 1997

[NOTARIAL SEAL]

- xc: U.S. Nuclear Regulatory Commission
Mr. S.D. Ebnetter, Regional Administrator
Assistant General Counsel for Hearings and Enforcement
- xc: Georgia Power Company
Mr. H.A. Franklin
Mr. W.G. Hairston
Mr. J.D. Woodard
- xc: Southern Nuclear
Mr. L.B. Long

ENHANCING NRC COMMUNICATIONS & KEY PRINCIPLES OF THE NUCLEAR PROFESSIONAL

Some NRC Perceptions

- Surprised and shocked - did not think
- Cut corners
- Cockey, did not follow procedures
- Cavalier, cowboy attitude
- Non-conservative action
- Not open with NRC communications
- Committed to change perception

Fundamental Nuclear Professional Principles

- Greatest respect for core
- Maximize margin for core safety
- Gets technical help (procedures, managers, experts)

Vogtle Examples - Perception Problem

- 87 Rx trips
- 89 March Unit 2 license - RHR check valve
- Site area emergency
- Outage problem - spray valves, PZR cooldown, ^{Site} site glass design, tygon tube, level drop, NRC communication
- OI Investigation

Action

- Could perceptions apply to you?
- Best communication - NRC and other departments
- Use procedures correctly
- Be a professional

George Bockhold's Personal Management Style

- Open communication
- Constantly work for improvement
- Partners in professionalism:
 - Pride
 - Desire
 - Knowledge
 - Attention to detail
 - Followup

Followup or Feedback

- Outage schedule - philosophy
- Procedures
- Overall - Positive
 - Better to know
 - Chance to improve

Summary

- Personal commitment to change perceptions
- Continue to improve NRC communication
 - Morning meeting
 - GM to Resident communication

Project	1-205-877-7885	1-404-554-500
Dept	Mgmt	311B
Off	G. Bockhold	G. Bockhold
Ext	SPNO PCD	VEGP
Phone	1-205-877-7885	1-404-554-500