December 27, 1994

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of	)	Docket Nos. 50-424-OLA-3
	)	50-425-OLA-3
GEORGIA POWER COMPANY, et al.	)	
	)	Re: License Amendment
	)	(Transfer to Southern
(Vogtle Electric Generating Plant, Units 1 and 2)	)	Nuclear)
	)	
	)	ASLBP No. 93-671-01-OLA-3

PREFILED TESTIMONY

OF

C.K. McCOY

TESTIMONY OF C. KENNETH McCOY

Q. PLEASE STATE YOUR NAME FOR THE RECORD.

A. My name is C. Kenneth McCoy.

Q. WHAT POSITIONS HAVE YOU HELD WITHIN THE SOUTHERN SYSTEM SINCE 1987?

A. The first position that I held within the Southern system was at Georgia Power Company as Vice President - Vogtle Project. I was elected to that position by the Georgia Power Board of Directors on May 18, 1988 and I still hold that position today. I also became Vice President - Vogtle Project of the Southern Nuclear Operating Company ("Southern Nuclear") when it was incorporated in December, 1990.

Q. WHAT ARE YOUR PROFESSIONAL QUALIFICATIONS?

A. A summary of my professional qualifications is attached hereto as Exhibit A, which is incorporated herein by reference.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to respond to Intervenor's assertion that Georgia Power misled the U.S. Nuclear Regulatory Commission ("NRC") regarding the organization responsible for

licensed activities at Plant Vogtle after the formation of the SONOPCO Project in 1988.

Q. WOULD YOU PLEASE SUMMARIZE YOUR TESTIMONY?

A. The essence of Intervenor's allegation, as I understand it, is that Georgia Power misled the NRC by informing the NRC that Mr. McDonald, Georgia Power's senior officer responsible for nuclear operations, reported to Georgia Power's CEO. I understand that Intervenor maintains that Mr. McDonald reported to Mr. Farley, who was not a Georgia Power officer. Intervenor is wrong.

With respect to the management of licensed activities at Plant Vogtle, I reported to Mr. Hairston, Georgia Power's Senior Vice President - Nuclear Operations; Mr. Hairston reported to Mr. McDonald, Georgia Power's Executive Vice President - Nuclear Operations; and Mr. McDonald reported to the Georgia Power CEO. Mr. Robert Scherer was CEO of Georgia Power until December 1988, when he was succeeded by Mr. Dahlberg. Mr. Farley had no authority or control over, and Mr. McDonald did not report to Mr. Farley concerning, the operation of Plant Vogtle.

Intervenor alleges that Georgia Power either failed to inform, or misrepresented to, the NRC what was the actual organizational structure of the SONOPCO Project, in particular

with respect to Mr. Farley's role, on numerous occasions from 1988 through the present. To the contrary, Georgia Power kept the NRC informed of its plan to form Southern Nuclear as well as the status of its progress towards that goal. It is inconceivable to me that the NRC representatives during this time did not receive all the information they sought or that they were unaware of the role of Mr. Farley.

Mr. Farley did have a role in guiding the formation of Southern Nuclear and otherwise providing Georgia Power with support services as an officer of Southern Company Services, Inc. ("SCS"). Mr. Farley's role was not material to the operation of Plant Vogtle. Mr. Farley's role in the formation of Southern Nuclear and otherwise providing support services to Georgia Power did not, in my view, constitute control over licensed activities. While there was no perceived need to reflect this role in licensing documents which depicted management and control, we also made no attempt to keep his activities a secret from the NRC. Indeed, as Mr. Farley's testimony states, he himself met with the NRC on at least two occasions to discuss the formation of Southern Nuclear.

Intervenor's claims are based on weak and improper inferences, speculation or outright mischaracterizations. For example, Intervenor asserts that a tape recording of a statement I made in 1990 supports his claim that Mr. Farley "created" or

"directed" the outage philosophy for Plant Vogtle. This is absurd. My statement says nothing more than the outage schedule philosophy was discussed with a number of high ranking individuals, including Mr. Farley.

Q. WHY DIDN'T THE 1988 AMENDMENTS TO SECTION 1.4.1.2 OF THE 1988 PLANT VOGTLE FSAR DISCUSS THE SONOPCO PROJECT AND MR. FARLEY'S INVOLVEMENT?

A. First, Section 1 of the FSAR is a general section, and Section 1.4.1.2 is just a very general description of the licensee's corporate structure. Specific information on the operating organization is found in Chapter 13. Second, on July 25, 1988, Georgia Power personnel met with NRC Region II staff to discuss Georgia Power's nuclear plant operations organization and the planned reorganization. Mr. Hairston's testimony discusses this meeting in more detail. The NRC's August 11, 1988 letter summarizing the meeting indicated the NRC was being kept apprised of Georgia Power's nuclear operations organization and the proposed project concept.

With respect to Mr. Farley, in 1988, he was President of Alabama Power Company. Although he had been asked by Mr. Addison to devote a portion of his time to guiding the formation of Southern Nuclear (see Stipulations Exhibit No. 10), he had no authority or control over licensed activities at Plant Vogtle.

Mr. Farley's role was not discussed because it was not material to the focus of the FSAR, i.e., Plant Vogtle licensed activities.

Q. WHY DIDN'T THE NOVEMBER 1988 AMENDMENTS TO CHAPTER 13 OF THE PLANT VOGTLE FSAR INDICATE THAT MR. MCDONALD REPORTED TO MR. FARLEY?

A. As President of Alabama Power, Mr. Farley was responsible for Alabama Power's Plant Farley at the time. Mr. McDonald did report to Mr. Farley concerning the operation of Plant Farley. Mr. McDonald reported to the Georgia Power CEO concerning the operation of Plants Hatch and Vogtle. Mr. Robert Scherer was CEO of Georgia Power until December 1988, when he was succeeded by Mr. Dahlberg. Mr. Farley had no authority or control over, and Mr. McDonald did not report to Mr. Farley concerning, the operation of Plant Vogtle.

Q. AT THAT TIME IN NOVEMBER, 1988 WAS THE GEORGIA POWER PRESIDENT IN THE PLANT VOGTLE MANAGEMENT CHAIN?

A. Between June 1, 1988 and December 14, 1988, according to Board of Director minutes, Mr. Scherer was Georgia Power's CEO while Mr. Dahlberg was Georgia Power's President. During that time, Mr. McDonald reported to Georgia Power's CEO, but not its President, with respect to the operation of Plant Vogtle. I personally observed Mr. Scherer's role in nuclear operations

oversight. Not only did he interview me for the Vice President's position over Plant Vogtle, but he also met with me when I was hired and laid out his expectations for my performance.

Mr. Dahlberg succeeded Mr. Scherer as CEO in December 1988, and he retained his position as President. From that point in December 1988 until Mr. McDonald's retirement in June, 1993, Mr. McDonald reported to Mr. Dahlberg, Georgia Power's President and CEO, concerning the operation of Plant Vogtle.

Q. DID YOU HAVE OCCASION TO OBSERVE THE RELATIONSHIP OF MR. McDONALD TO MR. DAHLBERG DURING THE TIME THAT THEY WERE GEORGIA POWER OFFICERS?

A. Yes.

Q. WHAT WAS THAT RELATIONSHIP?

A. I directly observed the actions of Mr. Dahlberg, as well the Georgia Power Board of Directors, in providing management oversight to Plant Vogtle. Mr. McDonald was the highest ranking officer of Georgia Power whose responsibilities were exclusively nuclear-related. Mr. Dahlberg had Company-wide responsibilities, including matters related to the fossil and hydropower facilities, the Georgia Public Service Commission and co-owner relationships. As with nuclear matters, he delegated

responsibility for various areas to dedicated officers. However, he kept abreast of nuclear matters, including the performance of the plants and the problems facing them. Based on my experience at INPO -- where I became familar with the degree of involvement of utility CEOs in their nuclear plants -- I know that the information provided to him and his input on nuclear operations matters was greater than the typical CEO involvement.

Mr. McDonald was more intimately involved in day to day oversight of nuclear operations, as would be expected given his positions. Nonetheless, he implemented the policies set by Mr. Dahlberg. For example, I recall working on nuclear operation and maintenance budgets with a specific cost control goal set by Mr. Dahlberg. I also recall his periodic review of Vogtle's "plant problems list" and our efforts aimed at resolving them. My personal impressions were that Mr. Dahlberg was a "quick study" who grasped the significance and meaning of information provided to him, and someone who would ask questions if he did not understand or if he felt that he could contribute an observation or insight into our efforts. He took a particular interest in his employees and their morale, and showed concern about events which could adversely affect them, such as individual hardship

Q. DID THE GEORGIA POWER EXECUTIVE VICE PRESIDENT - NUCLEAR OPERATIONS HAVE RESPONSIBILITY FOR THE TECHNICAL AND ADMINISTRATIVE SUPPORT ACTIVITIES PROVIDED BY SCS?

A. Yes. These SCS Services, under the direction of Mr. Louis Long, Vice President of Technical Services, and Mr. Charles McCrary, Vice President of Administrative Services, were provided by SCS to Georgia Power pursuant to the January 1, 1984 services agreement between those companies. While Messrs. Long and McCrary had a nominal reporting responsibility within SCS to higher SCS officers concerning SCS administrative matters, they reported functionally to Mr. McDonald, Georgia Power's Executive Vice President - Nuclear with respect to the particular services they were performing for Georgia Power. This arrangement was formalized by a letter agreement between Mr. McDonald and Mr. Allen Franklin, then President of SCS, dated April 24, 1989.

Q. DURING THE DECEMBER 1988 NRC INSPECTION OF THE BIRMINGHAM CORPORATE OFFICES, WAS THE NRC INFORMED OF THE ROLE OF MR. FARLEY?

A. I don't recall. I am sure the NRC was aware of Mr. Farley's role as President of Alabama and it is likely that the NRC was told that Mr. McDonald reported to Mr. Farley concerning the operation of Alabama Power's Plant Farley. Of course the NRC was made aware of this reporting relationship earlier in 1988. I

don't know whether the NRC was advised at that time of Mr. Farley's role in guiding the formation of the new nuclear operating company. As discussed above, his role was not material to the operation of Plant Vogtle and I don't believe Georgia Power perceived any obligation to formally advise the NRC of his role, even though I also do not believe that his role was kept secret. Certainly all the "SONOPCO Project" employees knew about Mr. Farley's involvement in guiding the formation of the proposed subsidiary as a result of broadly-disseminated, internal announcements.

Q. WHY DID THE CHART THAT WAS PROVIDED TO THE NRC DURING THE DECEMBER 1988 INSPECTION ENTITLED "SONOPCO PROJECT ORGANIZATION" NOT IDENTIFY MR. FARLEY?

A. Again, Mr. Farley was President of Alabama Power. At that particular time, he had no role in providing services to Georgia Power in support of the operation of Plant Vogtle or Plant Hatch. He had been asked to guide, and was guiding, the formation of the new operating company. Although I believe the NRC was aware of his role, there was no reason for him to be identified on a Georgia Power organizational chart depicting the reporting responsibilities with respect to operation of Plants Hatch or Vogtle; he had no such responsibilities.

Q. DID THE NOVEMBER 1988 AMENDMENTS TO THE VOGTLE FSAR INCLUDE THE PROJECT CONCEPT CHANGES TO THE GPC ORGANIZATION?

A. Yes. In fact, an attachment to the transmittal letter which highlighted the reasons for substantive changes included Item 41, "Changes to reflect revised corporate and plant organizations" associated with Chapters 13.1 and 17.2 of the FSAR. Chapter 13.1 laid out the changes in the corporate management for the Vogtle Project, such as the officer positions of Mr. McDonald in both Georgia Power and Alabama Power and the dedicated positions of the General Manager - Nuclear Support, Manager - Nuclear Administration and Manager-Engineering and Licensing for Vogtle. Relevant portions of Chapter 13.1 of these Amendments are attached as Exhibit B.

Q. DID THE NOVEMBER 1988 AMENDMENTS TO THE VOGTLE FSAR INCLUDE A STATEMENT THAT SCS TECHNICAL AND ADMINISTRATIVE SUPPORT SERVICES WERE BEING PROVIDED TO GEORGIA POWER?

A. Yes. As a primary example, Section 13.1.1.1.3, entitled "Technical Support for Operations" stated, in part:

> Technical support for the operation of GPC's nuclear power plants has been established and is funcitioning for its Hatch Nuclear Plant. Similar support capability will be available through the joint efforts of GPC nuclear support (Vogtle) general office staff and GPC's architect-engineer/service company, Southern Company Services (SCS).

The section, and following sections, detail the specific SCS accountabilities. Section 13.1.1.2.2.1, entitled "Executive Vice President-Nuclear Operations," explains that Mr. McDonald's position was responsible for the technical and administrative support activities provided by SCS.

Q. WHY DIDN'T THE 1990 AMENDMENTS TO THE FSAR INDICATE THAT MCDONALD REPORTED TO FARLEY?

A. With respect to licensed activities of Plant Vogtle, as I have stated earlier, Mr. McDonald reported to the President and CEO of Georgia Power, Mr. Dahlberg, during this time frame. In 1990, Mr. Farley was Executive Vice President - Nuclear of The Southern Company and SCS. His role in the SONOPCO Project was to guide the formation of the new operating company and to provide generic support on an industry basis. As he has described in his testimony, his relationship with Mr. McDonald was not one of reporting in connection with the operation of Plant Vogtle. He was providing support services as an SCS officer, pursuant to the letter agreement between Mr. McDonald and Mr. Franklin, dated April 24, 1989.

Q. WHY DIDN'T THE 1990 AMENDMENTS INDICATE THAT THE ADMINISTRATIVE SERVICES AND TECHNICAL SERVICES VPs REPORTED TO A JOINT OFFICE OF CEO?

A. To my knowledge, there wasn't any "joint office of the CEO" with respect to operations or licensed activities. I am aware that Mr. Farley described his relationship with Mr. McDonald as an informal office of the chief executive of SONOPCO Project with respect only to administrative matters unrelated to operations. This informal arrangement had nothing to do with the operation of Plant Vogtle or any other of Mr. McDonald's responsibilities as Georgia Power Executive Vice President - Nuclear. The reporting relationship between Mr. McDonald and Messrs. McCrary and Long was, as I've described it earlier in my testimony, not a functional one when it came to licensed activities. Mr. Farley's relationship with them was a result of their having a common employer, SCS. For some administrative matters unrelated to licensed activities, Mr. Farley worked with Mr. McCrary in providing support services under the SCS-GPC agreement.

Q. DOES THE 1991 AMENDMENT TO SECTION 13.1.1.2.1.1 OF THE FSAR ACCURATELY DEPICT THE REPORTING RELATIONSHIP OF GEORGIA POWER'S EXECUTIVE VICE PRESIDENT - NUCLEAR WITH RESPECT TO ALL MATTERS CONCERNING PLANT VOGTLE BUDGETS AND GPC PERSONNEL?

A. Yes.

Q. WHY DID FIG. 13.1.1-1 DENOTE THAT GEORGIA POWER'S EXECUTIVE VICE PRESIDENT - NUCLEAR REPORTED TO THE PRESIDENT AND CEO OF SNC WITH RESPECT TO SNC MATTERS ONLY?

A. Georgia Power's Executive Vice President - Nuclear, Mr. McDonald, was also an officer of Southern Nuclear at the time. (He was also an officer of Alabama Power until after the November, 1991 Plant Farley license amendments). Therefore, with respect to Southern Nuclear matters only, he reported to Southern Nuclear's CEO, Mr. Farley. Southern Nuclear matters included the administration of Southern Nuclear personnel, who were providing support services to Georgia Power much like SCS provided support services previously. However, Mr. Farley's Southern Nuclear position did not include management activities which were related to the operation of Plant Vogtle or to other Georgia Power matters such as personnel matters affecting Georgia Power employees.

Q. WAS THE APRIL 1, 1991 RESPONSE TO THE 2.206 PETITION ACCURATE IN STATING THAT MR. FARLEY DID NOT CREATE THE OUTAGE PHILOSOPHY OF PLANT VOGTLE AND THAT MR. McCOY DID NOT RECALL ANY STATEMENT HE MADE WITH REFERENCE TO MR. FARLEY?

A. Yes.

Q. DID YOU INFORM PLANT VOGTLE PERSONNEL IN 1990 THAT MR. FARLEY DIRECTED THE OUTAGE PHILOSOPHY FOR PLANT VOGTLE?

A. No. As an accurate partial transcript of the tape recording made by Mr. Mosbaugh reflects, the statement I made simply refers to discussions among the upper level managers working within the SONOPCO Project. Mr. Farley was an officer of SCS working in a support role within the SONOPCO Project. His thoughts on the matter were of interest to Georgia Power managers. However, Mr. Farley did not direct what the outage philosophy would be for Plant Vogtle, and I did not make any such statement that he did. Intervenor has mischaracterized my statements and taken them out of context. Neither did I say, nor can my words be fairly characterized as implying, that Mr. Farley set, established or created the outage scheduling philosophy. In actuality, my recollection is that this philosophy of outage scheduling was developed and implemented by Mr. McDonald earlier at Plant Farley.

While some of the discussion on Tape 236 of August 6, 1990 is inaudible, the excerpt does not suggest that Mr. Farley directed an outage philosophy. I have listened to a copy of that tape. The balance of the conversation following the excerpt which Intervenor has provided the Licensing Board is relevant and material. The further discussion indicates that I am confirming with the plant managers what my expectations had always been and

what they already knew. In the balance of the discussion, I state that "optimum" scheduling is consistent with our existing philosophy at Plant Vogtle in trying to operate to excellence, and that we're building schedules and they are being reviewed consistent with an "optimum" approach. The outage and planning manager verified that the schedule was consistent with that approach.

Q. WAS THE JULY 25, 1989 PRESENTATION TO THE NRC INACCURATE BECAUSE THE NRC WAS NOT INFORMED OF MR. FARLEY'S "MANAGEMENT RESPONSIBILITY OVER PLANT VOGTLE?"

A. No. As I have already explained, Mr. Farley had no management responsibility over Plant Vogtle. At that time Mr. Farley had become Executive Vice President of The Southern Company and SCS. His role was one of support pursuant to the April 24, 1989 letter agreement between Mr. McDonald and Mr. Franklin. The services Mr. Farley performed included guiding the formation of the new operating company and providing generic support on an industry basis. In my view, these services were not material to the operation of Plant Vogtle or Plant Hatch. Again, I believe the NRC was aware of Mr. Farley's role in guiding the formation of Southern Nuclear.

Q. WHY WASN'T THE SOUTHERN COMPANY MANAGEMENT COUNCIL DESCRIBED IN THE VOGTLE FSAR?

A. The Southern Company Management Council is not described in the Vogtle FSAR because it is not the licensee of Plant Vogtle or an organization that had any responsibilities in connection with the operation of Plant Vogtle. I understand that the Southern Company Management Council reviewed Georgia Power's budget in connection with The Southern Company's obligations towards its stockholders. However, I don't consider that activity as one which should have been described in the Vogtle FSAR.

Q. WAS THE APRIL 1, 1991 RESPONSE TO THE 2.206 PETITION ACCURATE IN STATING THAT THE SELECTION PROCESS USED FOR THE STAFFING OF THE SONOPCO PROJECT WAS NOT COMPLETED DURING A TWO-DAY MEETING OF SONOPCO PROJECT EXECUTIVES IN 1988?

A. Yes. While a number of individuals were identified as the most likely candidates for positions within the SONOPCO Project during that two, or maybe three, day meeting, the selection process actually continued for some period beyond that meeting, probably several weeks.

Q. WAS THE APRIL 1, 1991 RESPONSE TO THE 2.206 PETITION ACCURATE IN STATING "INTERVENOR'S CLAIM THAT VOGTLE PROJECT MANAGEMENT ASSUMES MR. FARLEY AND NOT MR. DAHLBERG CONTROLS VOGTLE'S OPERATION IS WITHOUT MERIT?"

A. Yes. I can unequivocally state that the Vogtle Project management, which included myself, Mr. Shipman, Mr. Hairston, and Mr. McDonald did not assume that Mr. Farley controlled the operation of Plant Vogtle. We were very much aware that Mr. McDonald was the senior nuclear executive in control of Plant Vogtle and that, in the case of licensed activities at Plant Vogtle and Georgia Power matters in general, he reported solely to Mr. Dahlberg, Georgia Power's President and CEO.

With respect to other employees working within the Vogtle Project, I am sure that on occasion employees would casually refer to "SONOPCO" interchangeably with "Georgia Power" or the "corporate office." But I am confident that they understood Mr. Farley had no responsibilities in connection with the operation of Plant Vogtle.

Q. DID MR. FARLEY PROVIDE MANAGEMENT DIRECTION OR OVERSIGHT CONCERNING PLANT VOGTLE OPERATIONS IN THE WEEKLY MONDAY MORNING STAFF MEETINGS HELD IN BIRMINGHAM?

A. No.

Q. WHAT WAS THE NATURE OF HIS PARTICIPATION IN THOSE MEETINGS?

A. Mr. Farley was kept informed of the developments concerning the three nuclear plants on The Southern Company system. It was clear to me, and I believe everyone in those meetings, that Mr. Farley was not there to give direction concerning the operation of any plant. As I have earlier described, Mr. Farley was providing support services to the SONOPCO Project at the time. Further, he was the prospective CEO of Southern Nuclear and needed to keep relatively current on developments concerning the plants in order to be knowledgeable when the time came for him to take on responsibility for operation of the plants.

Q. IS REVISION NO. 12 (APRIL 1990) OF THE CORPORATE EMERGENCY PLAN ACCURATE IN OMITTING ANY ROLE FOR MR. FARLEY AND IN OMITTING THE FACT THAT SCS AND THE SOUTHERN COMPANY PROVIDED MANAGEMENT SERVICES?

A. Yes, the revision is accurate. The Corporate Emergency Organization in effect in April 1990 is described in Section B of Revision No. 12 of the Corporate Emergency Plan for Vogtle Electric Generating Plant. Mr. Farley is not described in that section because he did not have a role in the Corporate Emergency Organization. In contrast, some of the support services provided by other SCS employees did fill positions within the Corporate Emergency Organization, such as the Radiological Assessment

Manager, the back-up Emergency Communications Director, and the Company Spokesperson. See, e.g., Sections B.7, B.9 and B.10 of Revision 12 of the Corporate Emergency Plan. These sections are attached hereto as Exhibit C.

Q. WERE MESSRS. McDONALD, HAIRSTON AND McCOY CONTROLLED FROM A PRACTICAL STANDPOINT BY MR. FARLEY?

A. No. Speaking for myself, and based on my observations of Mr. Farley's interaction with Messrs. McDonald and Hairston, there was no attempt by Mr. Farley to control the operation of Plant Vogtle. Furthermore, the line management authority over licensed activities was very clear to us all -- through me to Mr. Hairston, Mr. McDonald and Mr. Dahlberg. I recall that we were sensitive to the fact that Mr. Farley was not an officer of Georgia Power and, therefore, would not be involved in licensed activities. In my opinion we faithfully complied with that requirement. I am not aware of any instance when Mr. Farley gave direction to any officer or employee of Georgia Power with respect to Plant Vogtle's licensed activities, such as the processes performed at the plant, the operating procedures employed at the plant, the use of the plant or its equipment, or the manner in which the plant would comply with its NRC commitments, including Technical Specifications.

Q. ONCE MR. FARLEY BECAME PRESIDENT OF SOUTHERN NUCLEAR, WAS THE "MANAGEMENT SUPPORT ROLE" IN THE CORPORATE EMERGENCY PLAN CHANGED TO IDENTIFY SOUTHERN NUCLEAR AND THEREBY ELIMINATE GEORGIA POWER UNDER THE PLAN (PAGE B-9 OF REVISION 14)?

A. Yes. In Revision 14 to the Emergency Plan, which was submitted in December, 1991, the subsection entitled "OTHER CORPORATE PERSONNEL" was changed from "actions to be taken by GPC's Nuclear Operations Department" to "actions to be taken by Southern Nuclear Operating Company (SNC)" in the event of an emergency. This change and similar changes simply reflected the transfer of those individuals who would be responsible for corporate emergency response functions from Georgia Power to Southern Nuclear after Southern Nuclear's incorporation. The revision did not affect the roles and responsibilities of the various individuals; it was simply more accurate. As another example, later revisions more accurately referred to "GPC's" Emergency Communications Manager and "GPC's" Public Information Director. See, e.g., Revision 18 of May, 1993 and Revision 19 of January, 1994. These individuals were not tranferred to Southern Nuclear on January 1, 1991.

Q. DID GEORGIA POWER KEEP THE NRC INFORMED OF DEVELOPMENTS CONCERNING THE FORMATION OF SOUTHERN NUCLEAR?

A. Yes. As Mr. Hairston states in his testimony, there were many contacts with the NRC concerning the formation of Southern Nuclear. I was personally involved in most of those communications from the time I became an officer of Georgia Power, including the July 25, 1988 meeting, the December 19, 1988 management meeting and inspection, the July 25, 1989 meeting, the January 11, 1991 meeting, all of which are described in Mr. Hairston's testimony.

I was further responsible for the submittals to the NRC of amendments and updates to the Vogtle FSAR, including those dated November 23, 1988, March 28, 1990 and March 28, 1991. See Stipulation Nos. 13, 17 and 22.

I also had frequent contacts with NRC's Region II personnel, especially Mr. Ken Brockman. I viewed Ken as my counterpart, and with primary NRC "management" responsibility for Plant Vogtle. I attempted to keep him informed of developments affecting Plant Vogtle, with a concerted effort to avoid him being "suprised" by information obtained by his co-workers in the NRC. If Ken had a question or concern, he would call me, including my home. This was appropriate and, frankly, appreciated, because I was ensuring that we addressed issues of concern to the agency.

Q. WERE GEORGIA POWER'S STATEMENTS TO THE NRC OPEN AND HONEST CONCERNING WHO WAS IN CONTROL OF PLANT VOGTLE AND WHAT THE ROLE WAS OF MR. FARLEY?

A. Yes. In my opinion, Georgia Power always has been responsive to the NRC's questions concerning the organization and who was in control of licensed activities at Vogtle. As far as I am aware, the Company always provided information it believed to be accurate at the time it was provided. In the event that the Company determined material communications were inaccurate, it has taken appropriate action to so inform the NRC promptly and to correct the inaccuracies.

As far as the activities of Mr. Farley are concerned, I believe that the NRC was generally aware of Mr. Farley's role, even though it was not material to the operation of Plant Vogtle. In my opinion, Mr. Farley's activities never constituted control over the licenses for Plant Vogtle or direction of licensed activities.

Q. DID MR. McDONALD INSTRUCT "SONOPCO PROJECT" PERSONNEL TO NOT COOPERATE IN SUPPLYING TESTIMONY OR PROVIDING DATA FOR ALTERNATIVE PERFORMANCE STANDARDS DURING THE 1989 GEORGIA POWER GENERAL RATE CASE?

A. Yes, initially he did, until he understood the direction and support desired by Mr. Dahlberg. Early on in our dealings with the Public Service Commission staff's consultant (GDS Associates) we realized that the consultant was looking at nuclear performance standards for Georgia Power's nuclear plants. Mr. McDonald adamantly opposed nuclear performance standards, as contrasted with the industry's use of performance indicators. He had several reasons for his opposition, including safety reasons and the NRC's apparent concern at the time about such financial standards. At some point Mr. McDonald indicated that nuclear operations personnel under his direction in Birmingham would not support the development by non-nuclear employees in Atlanta of an "alternative" standard, that is, an alternate to what might be proposed by the consultant. I was told that later, in a meeting in Atlanta in early August, 1989, Mr. Dahlberg and Mr. McDonald discussed the performance standard issue, and Mr. McDonald agreed to assist those in Atlanta in addressing any proposed standard.

Following that early August meeting, Mr. Thomas Beckham, the Vice President of Plant Hatch, and I worked on and helped develop rebuttal testimony which opposed the imposition of performance

standards on Georgia Power. Our position was based on the PSC's need for such standards in light of the performance of the two plants, their potential adverse safety impact, the NRC's negative perception of such programs, and GDS's proposed methodology. We also contrasted performance indicators with performance standards, and attempted to explain that Georgia Power's organizational goals were weighed towards safety, not on-line time. Mr. Michael Barker and others on the Vogtle and Hatch Projects assisted us in preparing and presenting that testimony.

Mr. George Fitzpatrick, a Georgia Power consultant, worked on the development of an alternative performance standard during this time. As events developed later in August, 1989, the standard proposed by the PSC staff consultant was not as radical as some standards proposed in other jurisdictions. In fact, the GDS standard was largely based on a "capacity factor" standard presented by Mr. Fitzpatrick in another proceeding for the Palo Verde nuclear plant. Consequently, Mr. Fitzpatrick's rebuttal testimony critiqued the GDS standard, principally by echoing the potential problems of such standards as testified to by Mr. Beckham and me, and suggested revisions or refinements to the GDS standard. Mr. Barker and others reviewed the proposed GDS standard, I believe, for technical accuracy, such as the data used by GDS and assumptions of plant characteristics, and their work product was used, at least in part, in Mr. Fitzpatrick's final testimony.

From my perspective, after the early August meeting Mr. Beckham and I, as well as our Projects, supported Mr. Dahlberg's selected approach for addressing the nuclear performance standard proposed by the Public Service Commission consultant.

Statement of Qualifications
of
KEN MCCOY

Ken McCoy is Vice President - Nuclear of Georgia Power Company and is responsible for the oversight of Alvin W. Vogtle Nuclear Plant. He also serves as Vice President - Vogtle Project of Southern Nuclear Operating Company.

McCoy served in the United States Navy from 1964 - 1974 where he held positions as a Nuclear Submarine Officer, Instructor, Construction Engineer Officer and Squadron Engineer Officer.

In 1974 McCoy went to work for Mississippi Power and Light Company at the Grand Gulf Nuclear Station. While at Grand Gulf, McCoy served in various positions including Engineer, Assistant to the Plant Manager, Plant Manager, Assistant to the Senior Vice President and Loaned Employee to the Institute of Nuclear Power Operations.

In 1985, McCoy joined the permanent staff of the Institute of Nuclear Power Operations holding various positions including Division Director, Plant Operations Division. Mr. McCoy was employed by Georgia Power Company in 1988 as Vice President - Vogtle Project.

A native of Mississippi, McCoy received his bachelor's degree in Electrical Engineering from the University of Mississippi in 1965. He received an MBA from Mississippi College in 1977.

GPC EXHIBIT 7
McCOY B

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Vogtle Project

November 23, 1988

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

File: X7N00.0-39
Log: GN-1502

NRC DOCKET NUMBERS 50-424 AND 50-425
OPERATING LICENSE NPF-68
CONSTRUCTION PERMIT NUMBER CPPR-109
VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 AND 2
FSAR AMENDMENT NUMBER 39

Gentlemen:

Georgia Power Company, acting on its own behalf and as agent for Oglethorpe Power Corporation, Municipal Electric Authority of Georgia, and the City of Dalton, Georgia, hereby submits Amendment 39 to the Vogtle Electric Generating Plant (VEGP) Final Safety Analysis Report (FSAR).

The changes resulting from this amendment are identified in the Attachment. These changes are applicable to both Units 1 and 2. All substantive changes, for Unit 1, were evaluated as required by Title 10 CFR 50.59. This amendment contains all the known processed changes for Unit 2 as of October 31, 1988. Due to the time lag associated with the as-built notification process, not all of the FSAR figures have been updated in this amendment. Our submittals to the staff, as noted in the Attachment, do contain the information on drawing modification sheets and provide the appropriate cross references to the affected FSAR figures. Your staff will be notified should the final drawings materially differ from what was previously provided.

In accordance with the requirements of Title 10 CFR 50.30(f) and Title 10 CFR 50.4(b), one (1) signed original and thirty-seven (37) copies of Amendment 39 are submitted for your use. Also in accordance with the requirements of Title 10 CFR 50.4(b), copies of Amendment 39 are being sent to the NRC Regional Office and the NRC Resident Inspector.

File: X7N00.0-39
Log: GN-1502

Should you have any questions on the enclosed submittal, do not hesitate to contact me.

Yours truly,

P. D. Rice

SWORN AND SUBSCRIBED BEFORE ME, THIS 22nd DAY OF November, 1988.

Notary Public
Alabama State at Large

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PDR/sm
Attachment
xc: NRC Regional Administrator
NRC Resident Inspector
FSAR Distribution List

1543V

ATTACHMENT

Amendment 39 Changes

	Reason for Change	FSAR Section (s)	Category*
1.	Implementation of ATWS requirements (AMSAC). NRC approval by letter dated 10/3/88.	1.3, 1.6, 3.2, 7.2, 7.3, 7.7, 9.5.1, 9A, 10.2	2
2.	Conformance to 10CFR73.2(m) rather than SRP recommended RG 5.12, see Security Plan.	Table 1.8-1	2
3.	Invoking revision 2, 4/87, of RG 1.8. NRC Technical Specification approval by letter dated 11/1/88.	1.9.8	2
4.	Clarification of HEPA and carbon filter testing and conformance to TS.	1.9.52, 1.9.140, 6.4.5, 6.5.1, 9.4.1, 9.4.2, 9.4.3, 9.4.4, 9.4.5, 9.4.6	3
5.	Update analysis to reflect newly installed diesel and gasoline storage tanks at the warehouse.	2.2.3	3
6.	Completion detail information, placement of undocumented fill in nonsafety related area.	2.5.4.5	3
7.	Liquid and dry radwaste system and facility changes as notified to the NRC in GN-1461, 6/14/88 and GN-1472, 8/1/88.	1.2, Table 3.2.2-1, 7.6, 9.1, 9.2, 9.3, 9.4, 10.4.6, 11.2, 11.4, 11.5, 12.3	2
8.	Missile protection of DG fuel lines included under "Cat 1 piping and elec. cables"	Table 3.5.1-7	3
9.	Reflect addition of drain lines to support LLRT.	Figure 3.6.4-1, Table 6.2.4-1, Figure 6.2.4-1	3

	Reason for Change	FSAR Section (s)	Category*
10.	Update figure sheets to reflect use of fabricated nonstandard tees. Nonmirror Unit 2 break locations as notified to the NRC in GN-1495, 9/29/88.	Figures 3.6.1-1 & 2	2
11.	Leak Before Break revisions. NRC approval in SSER-7.	3.6.1, 3.6.2, 3.9.N.1, 5.4.14	2
12.	Incorporation of WESTAT Computer Program.	3.9.B.1	3
13.	Reflect design detail, changed Veritrak to Tobar pressure transmitter in steam line.	Table 3.11.N.1-1	3
14.	Reflect results of grid strength tests of Inconel grids.	4.2.3	3
15.	Unit 1 Cycle 2 change to reflect the incorporation of PMTC. NRC Technical Specification approval by letter dated 10/4/88.	4.3, 6.3, 6.5, 9.1.4, Chap. 15, Appendix 15B	2
16.	Unit 2 boron increase to 2600 ppm to provide consistency with the Unit 1 Cycle 2 change. Includes reanalysis of boron dilution transients.	6.1.1, 6.2.2, 6.3.2, 6.5.3, 15.4.6, 15.6.5	3
17.	Update containment coating estimates and revised hydrogen generation analysis.	Table 6.1.2-2, 6.2.5	3
18.	Revised LBLOCA analysis.	6.2.1, 15.6.5	3
19.	Clarify that inspections of the containment spray system will be done to code rather than a blanket commitment to inspect by radiographic means.	6.2.2	3

	Reason for Change	FSAR Section (s)	Category*
20.	Changed step sequence for switch over from injection to sump recirculation due to sump pH concerns. Design detail change, RHR discharge cross connect valves vented.	6.3.2	3
21.	Control room HVAC changes for two unit operation. Notified to the NRC in GN-1461, 6/14/88. Technical Specification approval by letter dated 8/17/88.	6.4, Table 6.4.2-1, 7.3.6, Table 7.3.6-2	2, 3
22.	Design change to reflect channel blocks to prevent unwanted FHB ventilation actuation.	7.3.5, 9.4.2	3
23.	Allow use of single RAT to provide both class 1E buses in modes 5 and 6.	8.3.1, Q430.59	3
24.	Text "dynamic analysis" changed to "horizontal displacement." Wording changed agreement made during 10/3-5/88 NRC audit of Unit 2 spent fuel racks.	9.1.2	2
25.	Provide description of the use and location of the BPRA, RCCA, and thimble plug change tools.	9.1.4	3
26.	Revise method of removing spent fuel pool gate seals by use of fuel handling machine. Hoist rope is IPS not stainless steel. Change to load sensing system due to operational modifications.	9.1.5	3

	Reason for Change	FSAR Section (s)	Category*
27.	Clarify that VEGP analysis is specifically for chlorine and fluoride halides.	9.3.2	3
28.	Reflect actual design of FHB normal ventilation system. Conform text to Figure 9.4.2-1 Sheet 1.	9.4.2	2/3
29.	Reflect as-built ratings of ESF HVAC systems.	9.4.5, Table 9.4.5-1	3
30.	Changes to the fire protection system, tests, and programs as notified to the NRC in GN-1497, 10/13/88. Fire detection exception removed for Unit 2. Changes discussed with the NRC during a fire protection audit.	9.5.1, T9.5.1-10a, 9A, 9B	2
31.	Design change to reduce shell side flow rate of diesel generator heat exchanger.	9.5.5, Table 9.5.5-1	3
32.	Reflect continuation of a quarterly diesel fuel oil analysis. Required by License Condition 2.C.6.	9.5.7	2
33.	MSIV opening time increased due to reduction in actuator pressure.	10.3.2	3
34.	Deleted specification for cation conductivity testing during SG wet layup, consistent with NSSS recommendations. Conformatory change, bring 10.3.5 in conformance with RG 1.16 position as presented in 1.9.16.2.	Tables 10.3.5-2 and 3	2/5
35.	Reflect as-built rating of mechanical vacuum pump.	10.4.2	5

	Reason for Change	FSAR Section (s)	Category*
36.	Design detail change to feedwater control valve and update to reflect plant operating procedures of main FW control valves.	10.4.7	5
37.	Text reworded to clearly show water quality is ensured by system design and not water treatment process.	11.2.2	3
38.	Updates to the PERMS o Detectable ranges per vendor recommendation o RE-2565A,B,&C, containment vent monitors are mounted on nonseismic duct o ARE-0025 has automatic control function of tripping electric boiler FW pumps o Change in flow rate range indication for radwaste pathway	11.5.2, Tables 11.5.2-1, 11.5.2-2, 11.5.2-5, Table 12.3.4-2	3
39.	Allow manager HP/chem to act as radiation protection manager.	12.1.1	3
40.	Revise radiation zone maps due to physical plant changes, radwaste changes and addition of Unit 2 information.	Figures 12.3.1-1, 2, and 5	3
41.	Changes to reflect revised corporate and plant organizations.	Chapter 13.1, 17.2	3
42.	Changes to reflect revised training program. Recognize training for approved equivalent badge training at other facilities.	13.2	3
43.	Revised to reference sections more consistent with valves' functions/actuation. Valve closure times revised to not exceed maximum allowable.	Table 16.3-4	3

	Reason for Change	FSAR Section (s)	Category*
44.	Reflect organizational changes to Unit 2, under construction, QA Program; response to 425/88-27-02; and GN-1507 11/9/88.	17.1, 17C	2/3

*Category:
1. Editorial changes and/or corrections (not applicable for Amendment 39).
2. Conforming changes and/or changes previously notified to the NRC.
3. Same licensing criteria; different implementation.
4. Change in licensing criteria (not applicable for Amendment 39).
5. Non-safety description changes.

13.0 CONDUCT OF OPERATIONS

13.1 ORGANIZATIONAL STRUCTURE OF APPLICANT

13.1.1 MANAGEMENT AND TECHNICAL SUPPORT ORGANIZATION

This section provides information concerning corporate organization, functions, and responsibilities, participation in the facility design, design review, design approval, construction management, testing, and operation of the plant. GPC nuclear operations' corporate and plant organizations are responsible for directing activities at VEGP. The organizations described in chapter 13 support and report to nuclear operations for assigned activities.

13.1.1.1 Design and Operating Responsibilities

The following paragraphs summarize the degree to which design, construction, and preoperational activities have been accomplished and describe the specific responsibilities and activities relative to technical support for operations.

13.1.1.1.1 Design and Construction Activities (Project Phase)

13.1.1.1.1.1 Principal Site-Related Engineering Work. Principal site-related work such as meteorology, geology, seismology, hydrology, and demography has been developed and is described in chapter 2. The VEGP preoperational monitoring program is described in the environmental report; this program establishes a preoperational baseline from which to evaluate future monitoring of environmental effects.

13.1.1.1.1.2 Design of Plant and Auxiliary Systems. Unit 1 engineering and construction are complete. As of August 1988, Unit 2 was 90.2-percent complete.

13.1.1.1.1.3 Site Layout with Respect to Environmental Effects and Security Provisions. Site layout with respect to environmental effects is described in chapter 2. Site security with respect to plant geographical layout and equipment is described in the security plan.

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13.1.1.1.1.4 Development of Safety Analysis Reports. Overall responsibility for preparation of the Final Safety Analysis Report (FSAR) rests with Southern Company Services (SCS) Nuclear Support and Quality Assurance Department. Preparation of the individual sections was assigned to the cognizant technical groups within Bechtel, Westinghouse, SCS, and Georgia Power Company (GPC).

13.1.1.1.1.5 Review and Approval of Material and Component Specifications. Project specifications for safety-related equipment are reviewed in accordance with the quality assurance program as described in chapter 17.

13.1.1.1.1.6 Procurement of Materials and Equipment. Procurement of Unit 2 materials and major-engineered equipment is complete.

13.1.1.1.1.7 Management and Review of Construction Activities. The project organization reports to the project management board, which is composed of senior executives of GPC, SCS, Bechtel, Westinghouse, and representatives of the plant's co-owners. The board reports to the chairman of the GPC board of directors and chief executive officer.

The vice president-project director (VP-PD), located at the jobsite, receives project direction from the project management board while reporting functionally to the GPC senior executive vice president. He is the overall project manager and has comprehensive line responsibility for design, construction, licensing, procurement, startup, and other project activities. Reporting to the VP-PD are the project licensing manager (PLM), Vogtle project engineering manager (VPEM), manager-project support (MPS), vice president-Vogtle project construction (VPC), the project comptroller, the Unit 2 project startup manager, the special projects manager, the general manager-Vogtle project prudence, and the readiness review manager.

13.1.1.1.2 Preoperational Activities

13.1.1.1.2.1 Development of Human Engineering Design Objectives and Design Phase Review of Proposed Control Room Layouts. The VEGP control room was designed using a reduced size control board and GPC operator input into the control board control configurations. The design incorporated the human factor design criteria at that time. An independent evaluation on human factor design has been performed on a mockup of the control room. A detailed discussion of control room design review and human engineering factors is described in chapter 18.

Design recommendations based on the mockup review were incorporated in the control board design or deferred for further evaluation. A detail design review was conducted on the as-built control room and utilized the plant simulator.

13.1.1.1.2.2 Development and Implementation of Staff Recruiting and Training Programs. The operating staff is described in subsection 13.1.2. Recruiting of personnel to fill these positions started in 1977. Unit 1 is essentially fully staffed. Training programs have been developed for this facility and are described in section 13.2.

13.1.1.1.2.3 Development of Plans for Initial Testing. The general manager-nuclear plant (GMNP) is responsible for all aspects of the initial test program of the VEGP. As part of his responsibilities, the GMNP (or his designee) will direct the development of the startup manual.

The startup manual defines the startup organization, defines the responsibilities of involved organizations and personnel, delineates the qualifications necessary for startup personnel, and contains the administrative controls necessary for the implementation of the initial test program. Also, refer to paragraph 13.1.2.2.5 for a discussion of the initial test program.

The administrative controls, qualification for testing personnel, and other required procedures for conducting that part of the initial test program after fuel load will be included in the plant procedure manual or startup test procedures manual.

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13.1.1.1.2.4 Development of Plant Maintenance Programs. The work force assigned to the VEGP will provide qualified maintenance personnel prior to initial fuel loading.

Structures, systems, and components that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public will be maintained in accordance with the quality assurance program.

The maintenance staff will be sized to perform the routine and preventive maintenance workload. The staff will be supplemented by outside contractors as deemed appropriate by plant management. Maintenance is performed under the direction of cognizant supervisors and in accordance with accepted work practices.

The scope and frequency of the preventive maintenance will be based on past experience with similar equipment and the manufacturer's recommendations. Records will be kept to establish the maintenance history of major safety-related equipment. Maintenance and repairs will be performed by qualified personnel in accordance with written work orders, maintenance procedures, standing orders, vendor technical manuals, and/or applicable codes and regulations. Qualified maintenance personnel will possess the skills to perform work without detailed written procedures. Except for emergencies, maintenance work will be preplanned. Training meetings will be held to foster safety awareness and quality of workmanship.

13.1.1.1.3 Technical Support for Operations

The GPC nuclear support (Vogtle) organization has overall authority and responsibility for assuring the availability of, providing, or securing adequate technical support for the VEGP. Technical support for the operation of GPC's nuclear power plants has been established and is functioning for its Hatch Nuclear Plant. Similar support capability is being planned and will be provided for the VEGP. This capability will be available through the joint efforts of the GPC nuclear support (Vogtle) general office staff and GPC's architect-engineer/service company, Southern Company Services (SCS). SCS's support will be provided through an onsite nuclear plant support group, a dedicated Vogtle nuclear operational/support organization in SCS's home office, and the Nuclear Engineering and Licensing (Vogtle) Department on the GPC nuclear support (Vogtle) corporate staff. The SCS site support group will be an adjunct to the SCS home office headquarters' organization. Portions of SCS's obligations may be fulfilled through the use of outside contractors as discussed below.

In fulfillment of these responsibilities, the GPC nuclear support (Vogtle) organization interfaces directly with, obtains services from, and holds SCS accountable for various assigned support activities which normally include the following:

A. Architect-engineering services required for the design-engineering of plant modifications, including maintenance-related design changes, plant improvement-related design changes, and design changes or major plant additions as a result of new regulatory requirements and commitments. These services include both conceptual and detail design, issue and maintenance of design drawings and specifications, review/approval of design change requests, incorporation of as-built notices, procurement, related Quality Assurance functions, etc.

B. Design-related safety evaluation and analysis.

C. Safety evaluation and analysis which are not directly related to design, i.e., operational requirements, technical specification changes, etc.

D. Inservice inspection and testing (both planning and actual implementation).

E. Nuclear fuel procurement.

F. Nuclear fuel core analysis.

G. Generic safety evaluations on prospective licensing issues.

H. Environmental, health physics, and plant chemistry support.

SCS currently has an organization in place for its "project phase" (Standard Review Plan terminology) scope of responsibility in support of the design, construction and licensing of the VEGP. This organization has both home office and onsite responsibilities and capabilities which are being converted into a long-term operational support organization to provide the type support noted above. This organization will be inclusive of all major design disciplines and will have the capability to contract for outside specialty technical support where additional expertise is needed and for major surges in manpower needs.

13.1.1.1.3.1 Nuclear, Mechanical, Structural, Electrical, Thermal-Hydraulic, Metallurgy and Materials, and Instrumentation

and Control Engineering. SCS will be the primary source of engineering in these disciplines. The Nuclear Engineering and Licensing (Vogtle) Department of the GPC

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nuclear support (Vogtle) organization is responsible for the interface with SCS. The duties of the manager-nuclear engineering and licensing (Vogtle) are described in paragraph 13.1.1.2.2.7.

13.1.1.1.3.2 Plant Chemistry. Support in the area of plant chemistry is the responsibility of SCS, as discussed in paragraph 13.1.1.1.3.

13.1.1.1.3.3 Health Physics. Health physics support is provided by SCS as discussed in paragraph 13.1.1.1.3

13.1.1.1.3.4 Fueling and Refueling Operations Support. The Nuclear Engineering and Licensing (Vogtle) Department of the nuclear support (Vogtle) organization is responsible for procuring support in this area from SCS and others, as discussed in paragraph 13.1.1.2.2.7.

13.1.1.1.3.5 Maintenance Support. The Nuclear Maintenance and Support (Vogtle) Department in the nuclear support (Vogtle) organization provides this support as discussed in paragraph 13.1.1.2.2.8.

13.1.1.2 Organizational Arrangement

13.1.1.2.1 Power Supply Organization

The senior executive vice president responsible for power supply directs all power plant construction and fossil and hydro generating plant operation. Included in the power supply organization are organizations of the general manager-fuel services, the senior vice president-fossil and hydro power, and the vice president and Vogtle project director.

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13.1.1.2.2 Nuclear Operations Organization

The nuclear operations organization, under the supervision of the executive vice president-nuclear operations, has direct responsibility for the operation and maintenance of GPC's nuclear plants. The nuclear operations organization consists of the plant operating staffs, the safety audit and engineering review organization, and the nuclear support (Vogtle) organization which provides support in the areas of engineering, licensing, maintenance, and administration.

Engineering support during plant operation will be provided primarily by the SCS Nuclear Plant Support Department. The SCS Technical Services-Nuclear Department will provide nuclear fuel contract administrative services, reload licensing, and operating licensing support. The structure of the General Office organization is shown in figures 13.1.1-2 and 13.1.1-3 and is described in the following paragraphs.

13.1.1.2.2.1 Executive Vice President-Nuclear Operations. The executive vice president-nuclear operations, an officer of both Georgia Power Company (GPC) and Alabama Power Company (APC), is responsible to the chairman and CEOs of each company for all aspects of operation of the nuclear generating plants in the GPC and APC systems, as well as technical and administrative support activities provided by SCS. The executive vice president-nuclear operations directs the senior vice president-nuclear operations in fulfillment of his responsibility.

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13.1.1.2.2.2 Senior Vice President-Nuclear Operations. The senior vice president-nuclear operations, an officer of both Georgia Power Company (GPC) and Alabama Power Company (APC), reports to the executive vice president-nuclear operations. This individual is responsible for the safe, reliable, and efficient operation of Plants Vogtle, Hatch, and Farley. The senior vice president-nuclear operations directs the efforts of the vice president-nuclear (Vogtle), the vice president-nuclear (Hatch), and the vice president-nuclear (Farley).

13.1.1.2.2.3 Vice President-Nuclear (Vogtle). The vice president-nuclear (Vogtle) reports to the senior vice president-nuclear operations and is responsible for operation and maintenance of Plant Vogtle as well as licensing, engineering, maintenance, and administrative support activities. The vice president-nuclear (Vogtle) directs the general manager-nuclear plant (Vogtle), the general manager-nuclear support (Vogtle), and the manager-safety audit and engineering review (Vogtle).

13.1.1.2.2.4 General Manager - Nuclear Support (Vogtle). The general manager-nuclear support (Vogtle) reports to the vice president-nuclear (Vogtle) and is responsible for corporate support in the areas of engineering, licensing, maintenance, and administration. The general manager-nuclear support (Vogtle) directs the manager-nuclear engineering and licensing (Vogtle), the manager-nuclear maintenance and support (Vogtle), and the manager-nuclear administration (Vogtle).

13.1.1.2.2.5 Manager-Safety Audit and Engineering Review (Vogtle). The responsibilities of the manager-safety audit and engineering review (Vogtle) are described in section 17.2.

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13.1.1.2.2.6 Manager-Nuclear Administration (Vogtle). The manager-nuclear administration (Vogtle) reports directly to the general manager-nuclear support (Vogtle) and is responsible for the following:

A. Develop and implement a contract administration program to ensure that contractors are properly qualified, appropriate approval of contracts is obtained, contractor performance is monitored, and prompt

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corrective action is taken when necessary. Ensure that contracted services can be procured on an expedited basis to support unanticipated needs.

B. Maintain and ensure implementation of the Nuclear Operations Procurement Policy. Provide methods to ensure the availability of parts and materials for routine operation and outage activities. Ensure that appropriate criteria are specified in procurement documents and that deviations from those criteria are properly controlled. Monitor parts and materials usage. Ensure proper receipt inspection, handling, storage, issuance, and recordkeeping for parts and materials. Periodically assess materials management activities and facilities and ensure corrective actions are carried out.

C. Administer a human resources planning program which identifies staffing needs and provides qualified personnel. Implement programs to identify and select candidates for employment, transfer, or promotion into positions in the Nuclear Operations Department. Ensure that effective performance appraisal and fitness-for-duty programs are implemented.

D. Ensure that records management programs provide for the appropriate handling of engineering and procurement documents, plant and corporate procedures, and other support documents. Ensure that the program identifies the necessary documents, specifies format and content requirements, designates responsibilities for disposition, provides for appropriate distribution, and provides for the necessary tracking and updating of documents. Provide facilities for records storage and ensure that procedures exist for monitoring records management performance. 24

E. Monitor plant programs for industrial safety. Ensure the establishment of industrial safety rules and practices. Review industry and regulatory safety information and incorporate into safety programs. Monitor plant safety data to identify trends and ensure the implementation of corrective actions when necessary. Monitor plant fire protection program. 25

F. Develop and implement the Nuclear Operations Corporate Policy, Instruction, and Directive System. Ensure that corporate guidance is incorporated and that responsibilities are clearly understood by plant and corporate departments.

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corrective action is taken when necessary. Ensure that contracted services can be procured on an expedited basis to support unanticipated needs.

B. Maintain and ensure implementation of the Nuclear Operations Procurement Policy. Provide methods to ensure the availability of parts and materials for routine operation and outage activities. Ensure that appropriate criteria are specified in procurement documents and that deviations from those criteria are properly controlled. Monitor parts and materials usage. Ensure proper receipt inspection, handling, storage, issuance, and recordkeeping for parts and materials. Periodically assess materials management activities and facilities and ensure corrective actions are carried out.

C. Administer a human resources planning program which identifies staffing needs and provides qualified personnel. Implement programs to identify and select candidates for employment, transfer, or promotion into positions in the Nuclear Operations Department. Ensure that effective performance appraisal and fitness-for-duty programs are implemented.

D. Ensure that records management programs provide for the appropriate handling of engineering and procurement documents, plant and corporate procedures, and other support documents. Ensure that the program identifies the necessary documents, specifies format and content requirements, designates responsibilities for disposition, provides for appropriate distribution, and provides for the necessary tracking and updating of documents. Provide facilities for records storage and ensure that procedures exist for monitoring records management performance. 24

E. Monitor plant programs for industrial safety. Ensure the establishment of industrial safety rules and practices. Review industry and regulatory safety information and incorporate into safety programs. Monitor plant safety data to identify trends and ensure the implementation of corrective actions when necessary. Monitor plant fire protection program. 25

F. Develop and implement the Nuclear Operations Corporate Policy, Instruction, and Directive System. Ensure that corporate guidance is incorporated and that responsibilities are clearly understood by plant and corporate departments.

G. Establish and implement plans and budgets for meeting the goals and objectives of the Nuclear Administration (Vogtle) Department.

H. Ensure that work done by and for the nuclear administration staff is of sufficient quality to ensure reliable service and satisfies the applicable requirements of the QA program.

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13.1.1.2.2.7 Manager-Engineering and Licensing-Vogtle. The manager-nuclear engineering and licensing (Vogtle) reports to the general manager-nuclear support (Vogtle) and is responsible for engineering and licensing support as well as emergency planning and fuel coordination. Specific functions include:

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A. Review, evaluate, and analyze regulatory information. Recommend positions on issues applicable to Plant Vogtle. Interpret and translate NRC requirements and commitments into company standards.

B. Maintain knowledge of, and respond to, nuclear industry issues through regular contact with owners groups, ad hoc groups, and architect/engineer and nuclear steam supply system (NSSS) interfaces. Review reports of industry experience for events of concern to Plant Vogtle and ensure appropriate preventive measures are taken.

C. Act as primary company interface with the Nuclear Regulatory Commission (NRC) for Plant Vogtle. Meet regularly with NRC representatives to maintain effective communication channels. Communicate company positions on regulatory issues to the NRC. Respond to NRC requests for information.

D. Maintain the Vogtle Final Safety Analysis Report (FSAR), Technical Specifications, Emergency Plan, Security Plan, and other licensing documents. Provide assistance to the plant staff on questions of interpretation.

E. Review violations and reportable events and their corrective actions as they affect plant safety or licensing bases.

F. Direct the engineering organizations supporting Plant Vogtle and hold them accountable for their assigned functions, which include design engineering of plant modifications, design-related safety evaluation and analysis, and operations-related safety evaluation and analysis.

G. Ensure technical excellence in the design process by direct participation in problem-solving and root-cause analysis, establishing design criteria, design verification and validation, control of field deviations, and final approval of designs. Periodically assess the effectiveness of the design analysis program and incorporate the results into program improvements.

H. Ensure the existence of design interface controls between different organizations performing engineering work affecting plant design. These controls include identification of organizational responsibilities, requirements for consistency in the design process, establishment of communication channels, conceptual design reviews, long- and short-range planning of modifications, work prioritization, controls on procurement specifications and procedures, and coordination of the turnover of modified systems.

I. Assure that specialized engineering expertise is available as needed. Assure the availability of engineering support for emergency situations.

J. Ensure that documentation and records of design activity are collected, stored, and maintained.

K. Assign project managers to direct and coordinate major and/or complex projects and programs. Evaluate the project scope and establish the bounds of authority of the project manager. Ensure that proper authorization of expenditures is obtained.

L. Staff the projects primarily with personnel from existing organizations. Obtain support from contractors if necessary.

M. Manage the project or program in accordance with its approved scope, ensuring adherence to schedule and budget.

N. Perform preliminary engineering and feasibility studies as directed by company management.

O. Review and evaluate industry information and experience, and incorporate lessons learned into engineering activities. Review plant and equipment performance trends.

P. Establish and implement plans and budgets to meet the goals and objectives of the Nuclear Engineering and Licensing (Vogtle) Department.

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Q. Ensure that work done by and for the Nuclear Engineering and Licensing (Vogtle) Department is of sufficient quality to assure reliable service and to satisfy the applicable requirements of the QA program.

R. Ensure that specialized nuclear fuel expertise is available as needed, including scheduling, procurement, conversion, enrichment, licensing, and core analysis.

S. Ensure preparation of plant emergency plans. Coordinate the planning and execution of emergency drills. Ensure that an effective training program exists for corporate emergency response personnel. Act as company interface with federal, state, and local authorities. Coordinate assessment and improvement of emergency plans. Develop and implement criteria for emergency facilities and prompt notification systems. Ensure the existence of procedures for public information exchange.

13.1.1.2.2.8 Manager-Nuclear Maintenance and Support (Vogtle). The manager-nuclear maintenance and support (Vogtle) reports to the general manager-nuclear support (Vogtle) and is responsible for the following activities:

A. Conduct a continuing evaluation of plant maintenance programs. Identify needed improvements and track their implementation. Areas to be evaluated include: preventive maintenance programs, work control systems, surveillance programs, maintenance performance indicators, plant material condition, NPRD utilization, and contracted maintenance services.

B. Review and evaluate maintenance trends. Ensure that underlying causes are identified and corrective actions are tracked to completion. Assess maintenance-related developments and trends in the utility industry for application or impact on Plant Vogtle.

C. Ensure the implementation of effective maintenance planning and scheduling mechanisms.

D. Assist in achieving excellence in outage management. This includes long-term planning for early identification of outage activities, identification of required resources, procurement of outage services, planning of preoutage preparations, monitoring of outage progress and adjustment of outage plans, and evaluation of outage performance.

E. Establish and implement Nuclear Maintenance and Support (Vogtle) Department plans and budgets. Ensure that work done by and for the Nuclear Maintenance and Support (Vogtle) Department is of sufficient quality to assure reliable service and to satisfy the requirements of the QA program.

F. Manage inservice inspection and testing programs.

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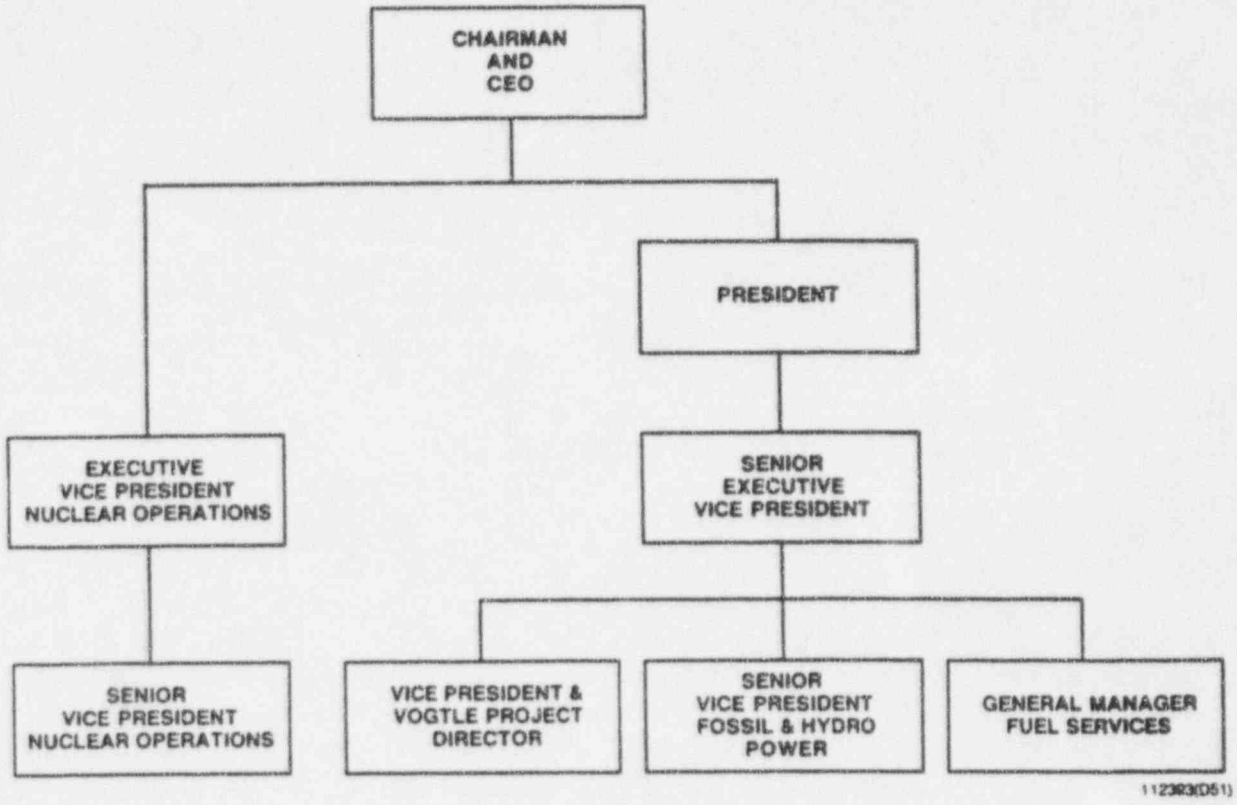
13.1.1.2.3 Quality Assurance

The manager-safety audit and engineering review (MSAER) is responsible functionally to the vice president-nuclear (Vogtle). The MSAER is authorized to manage the QA program for design, construction, testing, operation, and maintenance and to ensure its implementation in accordance with the requirements of the QA Manual. The SAER organization is composed of a staff in the corporate headquarters and at the VEGP plant site.

The SAER organization will not provide technical support (as defined in Section 13.1.1 of Regulatory Guide 1.70) for the operation of VEGP. The activities of the SAER organization are fully described in section 17.2.

Amend. 24 6/86
Amend. 25 9/86
Amend. 26 10/86
Amend. 29 11/86
Amend. 35 3/88
Amend. 39 11/88



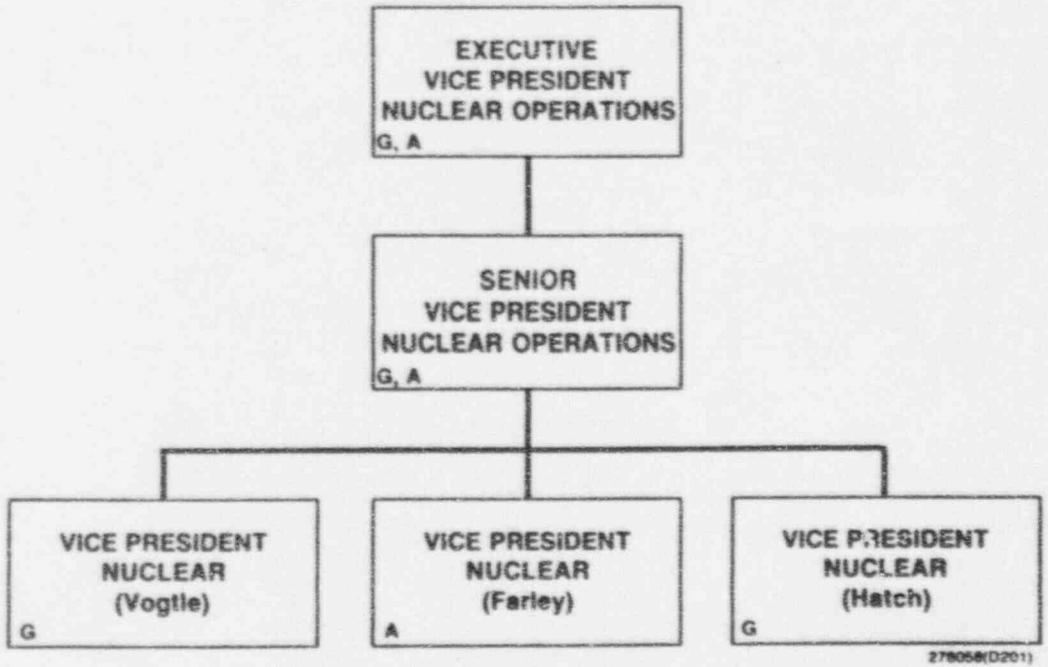
Amend. 3	1/84
Amend. 16	4/85
Amend. 24	6/86
Amend. 25	9/86
Amend. 26	10/86
Amend. 39	11/88

Georgia Power

VOGTLE
ELECTRIC GENERATING PLANT
UNIT 1 AND UNIT 2

CORPORATE ORGANIZATION
VEGP UNITS 1 AND 2

FIGURE 13.1.1-1



LEGEND

A = APC
G = GPC

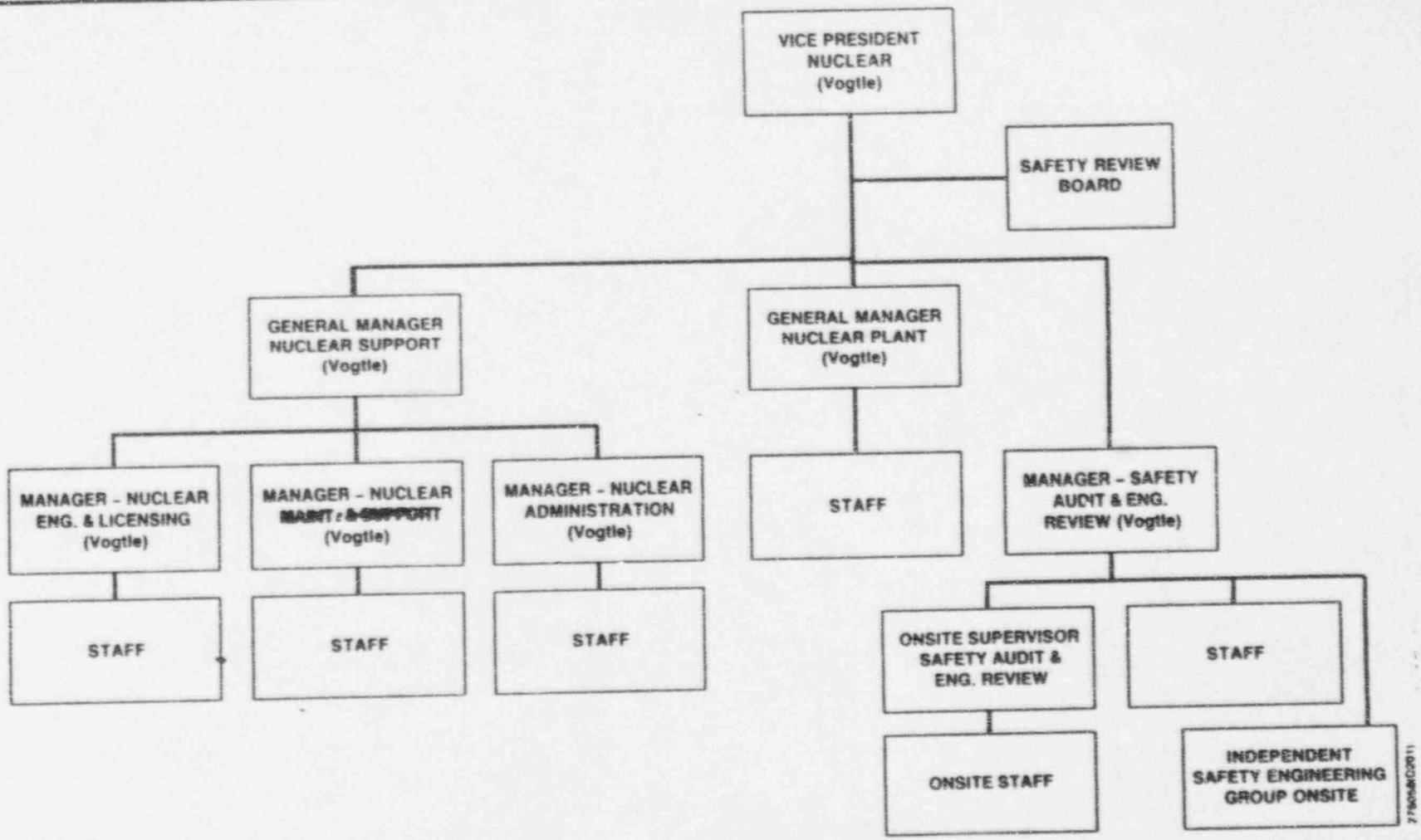
Amend. 16 4/85
Amend. 24 6/86
Amend. 25 9/86
Amend. 26 10/86
Amend. 29 11/86
Amend. 35 3/88
Amend. 39 11/88

Georgia Power

VOGTLE
ELECTRIC GENERATING PLANT
UNIT 1 AND UNIT 2

NUCLEAR OPERATIONS ORGANIZATION
VEGP UNITS 1 AND 2

FIGURE 13.1.1-2



Amend. 15 3/85
Amend. 16 4/85
Amend. 24 6/86
Amend. 26 10/86
Amend. 29 11/86
Amend. 35 3/88
Amend. 39 11/88

Georgia Power

VOGTLE
ELECTRIC GENERATING PLANT
UNIT 1 AND UNIT 2

TECHNICAL SUPPORT ORGANIZATION
VEGP UNITS 1 AND 2

FIGURE 13.1.1-3

Revision 12

Section B

B.7 Radiological Assessment Manager

1. The manager-regulatory, engineering, and environmental services (Technical Services) will designate those persons who will assume the duties of radiological assessment manager. 11

   Designation of persons to assume these duties will be accomplished on a rotational schedule provided by the manager-environmental services. Normal assignment will be:

   - Project supervisor-radiation protection and chemistry (Tech Services) 11
   - Senior nuclear specialists (Tech Services)
   - Nuclear specialists (Tech Services)
   - Nuclear specialists (Tech Services)

2. The duties and responsibilities of the radiological assessment manager are as follows:

   a. Provide an As Low As Reasonably Achievable (ALARA) exposure review of engineering modifications and tasks proposed by the emergency organization, including necessary documentation of those reviews.

   b. Assist the dose assessment manager in the EOF in assessment of offsite radiological consequences of the event and keep the general office operations center manager informed of the assessment.

   c. Develop methods for treatment and/or disposal of radioactive wastes resulting from the emergency and recovery operations.

   d. Support the plant dose assessment manager, as necessary.

   e. Ensure that the General Office Operations Center maintains readiness for dose projections in the event the EOF is evacuated and the responsibility is delegated to the General Office Operations Center temporarily until the backup EOF is activated.

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REV 5 2/86
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REV 10 2/88
REV 11 1/89
REV 12 4/90

B.8 Public Information Manager

1. The director-corporate communication will normally assume the duties and responsibilities of the public information manager. If he/she is not available, the line of succession is as follows:

   a. Public affairs coordinator.

b. Communication services manager. |11

2. The duties and responsibilities of the public information manager are as follows:

a. In the early hours of an emergency, report to and maintain communications with the director of corporate response, or his/her alternate.

b. Determine degree of Emergency Communications Plan activation and initiate activation, as necessary.

c. When the EOF is activated, go to that location to serve as liaison between the emergency director and the ENC.

B.9 Emergency Communications Director

1. The communication services manager will normally assume the responsibilities of emergency communications director. If he/she is not available, the line of succession is as follows: |11

a. Director of public relations, Southern Company Services.

b. Employee/external communications manager.

2. The duties and responsibilities of the emergency communications director are as follows:

a. Maintaining emergency communications liaison with the EOF when the public information manager leaves for the EOF and until the public information manager assumes his duties at the EOF.

b. Assuming responsibility at Corporate headquarters for liaison between the ENC and the General Office Operations Center.

|11

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REV 9 1/87
REV 10 2/88
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B.10 Company Spokesperson

1. The manager-environmental services (Technical Services) will normally assume the duties and responsibilities of company spokesperson. Alternates for this position are: 11

   a. Manager-nuclear engineering and licensing (Vogtle Project).

   b. Manager-training and emergency preparedness (Vogtle). 11

2. The duties and responsibilities of the company spokesperson are as follows:

   a. In the early hours of the emergency, receive technical information from the director of corporate response in the General Office Operations Center, and present this information to the media during briefings in the Corporate Office.

   b. When the Emergency News Center (ENC) is activated, the company spokesperson is relocated there and is responsible for receiving technical information, coordinating with the ENC director, and presenting this information to the news media per the VEGP Emergency Communications Plan and the Emergency Communications Implementing Procedures (ECIPs).

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REV 10 2/88
REV 11 1/89
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B.11 Emergency Support Staff and Administrative Assistants

1. The Emergency Support staff and administrative assistants will report to the General Office Operations Center, as directed. This job title refers to a number of individuals performing a variety of designated tasks. Their numbers will depend on the type and duration of the emergency.

2. The Emergency Support staff are technical personnel designated by the managers of the Corporate Emergency Organization. They provide management, technical, and regulatory support during an emergency.

3. The administrative assistants are the nontechnical members of the Corporate Emergency Response Organization. They perform duties designated by the administrative/logistics manager or appropriate manager which include but are not limited to the following:

   a. Providing clerical and secretarial support to the Emergency Organization.

   b. Operation of word processors.

   c. Operation of telecopiers.

   d. Making entries to and retrieving data from Nuclear Network.

   e. Retrieval of file documents.

   f. Updating status boards using information provided from VECP.

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REV 11 1/89
REV 12 4/90

TABLE B-1 (SHEET 1 OF 2)

CORPORATE EMERGENCY ORGANIZATION ASSIGNMENTS

EMERGENCY POSITION	ASSIGNMENT
DIRECTOR OF CORPORATE RESPONSE	• GENERAL MANAGER-NUCLEAR SUPPORT • MANAGER-NUCLEAR ENGINEERING & LICENSING • MANAGER-NUCLEAR MAINTENANCE SUPPORT • MANAGER-LICENSING
GENERAL OFFICE OPERATIONS CENTER MANAGER	• MANAGER-SAFETY AUDIT & ENGINEERING REVIEW • SENIOR PROJECT ENGINEER • SUPERVISOR-PLANNING AND PERFORMANCE • EMERGENCY PLANNING COORDINATOR
ADMINISTRATIVE/LOGISTICS MANAGER	• SUPERVISOR-ADMINISTRATIVE SUPPORT • SUPERVISOR-MATERIAL SUPPORT • SUPERVISOR-DOCUMENT CONTROL • SENIOR ENGINEER I
ENGINEERING SERVICES MANAGER	• MANAGER-ENGINEERING • SENIOR PROJECT ENGINEER (MAINTENANCE SPT) • PROJECT ENGINEER (ENGINEERING) • PROJECT ENGINEER (ENGINEERING)
RADIOLOGICAL ASSESSMENT MANAGER	• PROJRECT SUPERVISOR-RADIATION PROTECTION AND CHEMISTRY (TECH SERVICES) • SENIOR NUCLEAR SPECIALISTS (TECH SERVICES) • NUCLEAR SPECIALISTS (TECH SERVICES) • NUCLEAR SPECIALISTS (TECH SERVICES)
PUBLIC INFORMATION MANAGER	• DIRECTOR-CORPORATE COMMUNICATIONS • PUBLIC AFFAIRS COORDINATOR • COMMUNICATIONS SERVICES MANAGER

	REV 0	11/30/84	REV 9	1/87
	REV 2	11/85	REV 10	2/88
	REV 5	2/86	REV 11	1/89
	REV 6	7/86	REV 12	4/90
17	REV 8	12/86		

TABLE B-1 (SHEET 2 OF 2)

CORPORATE EMERGENCY ORGANIZATION ASSIGNMENTS

EMERGENCY POSITION	ASSIGNMENT	
EMERGENCY COMMUNICATIONS DIRECTOR	• COMMUNICATIONS SERVICES MANAGER • DIRECTOR OF PUBLIC RELATIONS (SOUTHERN COMPANY SERVICES) • EMPLOYEE/EXTERNAL COMMUNICATIONS MANAGER	
COMPANY SPOKESPERSON	• MANAGER-ENVIRONMENTAL SERVICES (TECH SERVICES) • MANAGER-NUCLEAR ENGINEERING & LICENSING (VOGTLE PROJECT) • MANAGER TRAINING & EMERGENCY PREPAREDNESS (VOGTLE)	11