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March 9, 1995



LCV-0171-C

Docket No. 50-424

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

Ladies and Gentlemen:

**VOGTLE ELECTRIC GENERATING PLANT
REPLY TO A NOTICE OF VIOLATION**

Pursuant to 10 CFR 2.201, Georgia Power Company submits the enclosed information in response to a Unit 1 violation identified in Vogtle Electric Generating Plant (VEGP) Inspection Report Nos. 50-424;425/94-30 which concerns the inspection conducted by the VEGP NRC Resident Inspectors from December 18 - January 21, 1995.

Should you have any questions feel free to contact this office.

Sincerely,

CKM/g
C. K. McCoy

CKM/AFS

Enclosure: Reply to NOV 50-424/94-30-02

cc: Georgia Power Company
Mr. J. B. Beasley, Jr.
Mr. M. Sheibani
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebnetter, Regional Administrator
Mr. D. S. Hood, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

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ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNIT 1 REPLY TO A NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424;425/94-30

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

"During the NRC inspection conducted on December 18, 1994, through January 21, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the Violation is listed below:

10 CFR 50.59, Changes, Tests, and Experiments, states, in part, that the holder of a license authorizing operation of a production facility may make changes in the facility as described in the safety analysis report without prior Commission approval, unless the proposed change involves an unreviewed safety question. A proposed change, test, or experiment shall be deemed to involve an unreviewed safety question if the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report may be increased.

Contrary to the above, on February 21, 1992, the licensee performed an inadequate 10 CFR 50.59 safety evaluation which was used to change leakage testing requirements for ten auxiliary component cooling water containment isolation valves. A subsequent review of this evaluation by the licensee on September 24, 1993, identified that this change in testing requirements resulted in an unreviewed safety question, in that one of the valves was subsequently tested on September 17, 1994, and exceeded the allowable overall integrated containment leakage rate.

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

This violation is applicable to Unit One only."

RESPONSE TO VIOLATION (50-424/94-30-02)

Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

Reason for the Violation:

The cause of this event was an inadequate safety evaluation in 1992 for an FSAR Licensing Document Change Request (LDCR) to FSAR Table 6.2.4-1. The safety evaluation failed to consider that, even though the auxiliary component cooling water

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VOGTLE ELECTRIC GENERATING PLANT - UNIT 1 REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424;425/94-30

(ACCW) system is seismically qualified and constructed of mostly ASME Class 3 materials, the ACCW system in the containment was not installed to meet the ANSI N271-1976 standard criteria for a closed system. The basis for the 1992 FSAR change was that the subject valves do not receive a containment isolation signal (they are remote manually operated), and that maintaining the associated penetrations open is considered essential due to the desirability of maintaining cooling water to the reactor coolant pumps (RCPs) under most post-accident conditions. In addition, it was thought that the ACCW was a closed system since it does not communicate directly with the containment atmosphere or primary coolant. However, the safety evaluation for the FSAR change failed to consider that the ACCW system in the containment was not installed to meet the ANSI N271-1976 standard criteria for a closed system. Therefore, the isolation valves must be considered to perform an isolation function and should be subject to Type C testing at intervals no greater than 2 years per the appropriate 10 CFR 50, Appendix J, criteria, or anytime maintenance is performed on the valves that could affect the valves pressure boundary.

Corrective Steps Which Have Been Taken and the Results Achieved:

- 1) During the fall of 1993, design engineering was reviewing FSAR Table 6.2.4-1 as part of an evaluation of a design change and noted that an inappropriate revision had been made to the table which had removed Type C testing for the ACCW valves. As a result of the above review, an additional review was conducted to determine if any testing requirements had been missed. This review found that the 2-year test interval had not expired for any of the subject valves.
- 2) A letter was sent to the Commission on September 30, 1993, requesting: A) a one-time exemption to the Appendix J Type C test interval for the subject Unit 1 ACCW valves and, B) a corresponding revision to the TS 4.6.1.2d by adding a footnote that would extend the Type C test interval for subject valves consistent with the exemption request. This request was approved by the Commission on October 26, 1993, and allowed testing for these Unit 1 valves to be performed during the Fall 1994 refueling outage.
- 3) FSAR Table 6.2.4-1 was revised on October 13, 1993 to ensure that the appropriate testing requirements are listed for the ACCW isolation valves.
- 4) Appropriate procedures have been revised to require that any changes to the FSAR will be evaluated to determine if a design engineering review is required. When this review is performed, it assesses LDCRs for their affect on design criteria.

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- 5) Plant personnel performed local leak rate testing on the Unit 1 ACCW valves during the fall 1994 outage. However, it was discovered that valve 1HV-1979 was found to have exceeded leak rate criteria. The cause of the excessive leak rate was an incorrect adjustment of a closed limit switch, performed during the Spring 1993 refueling outage, that prevented the valve from fully closing. A investigation showed that none of the other LLRT tested valves were affected by incorrect adjustments of limit switches. Valve 1HV-1979 was reworked, tested satisfactorily, and returned to service. An improved sensor that indicates valve seating force is now used for setting-up limit switches on butterfly valves. This improved sensor, combined with follow-up leak rate testing, should prevent a recurrence of this event.
- 6) On December 6, 1994, a revision to LER 1-93-11 was submitted to the Commission providing details of the leakage test that was performed during the fall 1994 outage. LER 1-93-11 was originally submitted on October 21, 1993.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

Since all corrective actions are completed, no further action is warranted at this time.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on October 13, 1993, when FSAR Table 6.2.4-1 was revised to include the ACCW valves for 10CFR50 Appendix J, Type C leak rate testing.