

Georgia Power Company
40 Inverness Center Parkway
Post Office Box 1296
Birmingham, Alabama 35201
Telephone 205 877-7122

C. K. McCoy
Vice President, Nuclear
Vogtle Project



the southern electric system

November 25, 1991

ELV-03223
1202

Docket Nos. 50-424
50-425

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
REPLY TO A NOTICE OF VIOLATION

Pursuant to 10 CFR 2.201, Georgia Power Company (GPC) submits the enclosed information in response to the violations identified in Inspection Report 50-424,425/90-19 Supplement 1 which concerns the inspection conducted by a NRC Special Inspection Team during August 6-17, 1990.

Should you have any questions, please contact this office.

Sincerely,

C.K.M.'g
C. K. McCoy

CKM/JAB/gmb

Enclosure

c(w): Georgia Power Company
Mr. W. B. Shipman
Mr. M. Sheibani
NORMS

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

TEO1 11

ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 AND 2
REPLY TO A NOTICE OF VIOLATION
VIOLATION 50-424;425/90-19-12
NRC INSPECTION REPORTS 50-424/90-19 AND 50-425/90-19

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

Contrary to the above, during the inspection conducted on August 6-17, 1990, two examples were identified in which the licensee failed to establish or implement the procedures for these required activities as follows:

1. Administrative Procedure 00150-C, "Deficiency Control," states that a deficiency card must be written if the deficiency involves safety-related components which are to be dispositioned "use-as-is/repair," or other conditions involving safety-related components which require engineering support or other technical assistance to determine if the component is deficient.

On August 17, 1990, the NRC identified that a deficiency card was not written on residual heat removal (RHR) pump #1B (a safety-related component) to document the pump's degraded conditions which were dispositioned "use-as-is". (Discussed in Section 2.2 of this inspection report)

2. Administrative Procedure 00100-C, "Quality Assurance Records Administration," Paragraph 4.1.1.8, specifies that quality assurance (QA) records will exhibit necessary and appropriate signatures or initials and dates.

On August 17, 1990, the NRC identified that the Unit Superintendent incorrectly initialed, dated, and signed a QA record which voided Temporary Change Procedure (TCP) 1802-C-7-90-1 to Abnormal Operating Procedure 1802B-C, "Loss of Instrument Air," with the date of June 12, 1990, in lieu of the actual date (June 15, 1990) on which the document was signed. (Discussed in Section 2.3 of this inspection report)

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

RESPONSE TO VIOLATION 50-424;425/90-19-12

EXAMPLE 1

Admission or Denial of the Violation:

The violation in Example 1 did not occur as stated. During the 1R2 outage, Administrative Procedure 00150-C, "Deficiency Control," Revision 9 dated November 3, 1989, did not state that a deficiency card must be written for deficiencies involving safety-related components which are to be dispositioned

ENCLOSURE (CONTINUED)

REPLY TO A NOTICE OF VIOLATION
VIOLATION 50-424;425/90-19-12
NRC INSPECTION REPORTS 50-424/90-19 AND 50-425/90-19

"use-as-is or repair" or for other conditions involving safety-related components which require engineering support or other technical assistance to determine if the component is deficient.

The two criteria above for initiating a deficiency card, were included in Procedure 00150-C, Revision 10 approved on May 10, 1990, which was after the degraded condition identified for the RHR pump. A review of the control room logs identified the RHR pump "B" vibration as having occurred on March 4, 1990.

Reason for the Violation:

A deficiency card was not initiated for the higher than normal RHR pump vibration or the NSCW motor cooler outlet leak because the residual heat removal (RHR) pump "B" was not considered inoperable. The plant staff evaluated the vibration data and it did not reach inservice test (IST) alert levels, and the cooling water leak did not prevent continued cooling of the RHR pump motor. No deficiency card was generated because the evaluation determined the pump would still perform its intended safety function, the Operations Department personnel did not declare the pump inoperable, and the revision of Procedure 00150-C which was in effect at the time did not require the initiation of a deficiency card.

Corrective Steps Which Have Been Taken and the Results Achieved:

In May 1990, Revision 10 of Procedure 00150-C included the following criteria for initiation of deficiency cards on safety-related components:

- o Deficiencies involving safety-related components which are to be dispositioned "use-as-is or repair."
- o Other conditions involving safety-related components which require engineering support or other technical assistance to determine if the component is deficient.

Corrective Steps That Will Be Taken to Avoid Further Violations:

The changes made in Revision 10 of the Procedure 00150-C will assure that in the future, if similar conditions occur, a deficiency card will be issued.

ENCLOSURE (CONTINUED)

REPLY TO A NOTICE OF VIOLATION
VIOLATION 50-424;425/90-19-12
NRC INSPECTION REPORTS 50-424/90-1 AND 50-425/90-19

Date When Full Compliance Will Be Achieved:

The circumstances described in the inspection report do not indicate that a failure to comply with Procedure 00150-C occurred. The procedure in effect at the time of this event did not require the initiation of a deficiency card. On May 10, 1990, Procedure 00150-C was revised to provide further guidance on deficiency card initiation. This revision was for reasons unrelated to the events described in the inspection report.

EXAMPLE 2

Admission or Denial of the Violation:

A violation of Administrative Procedure 00100-C associated with Temporary Change Procedure 18028-C-7-90-1 occurred. However some of the discussion in Section 2.3 of the Inspection Report's Supplement is not confirmed by this reply. Specifically, Georgia Power Company (GPC) does not ascribe to the rationale attributed to the Unit Superintendent's actions and believes that the very brief synopsis of the testimony of the Unit Superintendent as set forth on page 14 of the Supplement is incomplete in relevant and material aspects. This event was identified by GPC prior to the inspection (Deficiency Card 1-90-282).

Note that the Temporary Change Procedure number should be 18028-C-7-90-1 not 1802-C-7-90-1 as denoted in the Notice of Violation.

Reason for the Violation:

The reason for the violation as cited in the Notice of Violation was personnel error by the Unit Superintendent. The violation was dating the signature with the date of the decision to void the procedure instead of the date of the signature.

The Unit Superintendent indicated that prior to this event he had never processed the voiding of a TCP, and on June 12, 1990, (the date on which Revision 8 was approved by the Plant Review Board (PRB)) was acting in the stead of the Operations Manager. The TCP form was presented to the Unit Superintendent on June 15, 1990, by the Operations Department procedure coordinator - 3 days after the TCP was considered voided at PRB meeting 90-82 on June 12, 1990. The Operations Department procedure coordinator indicated to the Unit Superintendent that the permanent procedure had been approved on that date. As far as the Operations Department procedure coordinator was concerned, the original TCP was voided by the approval of AOP 18028-C, which had already

ENCLOSURE (CONTINUED)

REPLY TO A NOTICE OF VIOLATION
VIOLATION 50-424;425/90-19-12
NRC INSPECTION REPORTS 50-424/90-19 AND 50-425/90-19

incorporated the TCP. Consequently, the Operations Department procedure coordinator appears not to have told the Unit Superintendent on June 15 that the 14-day requirement for approval or disapproval of TCPs pursuant to Technical Specification 6.7.3 had been exceeded. Consistent with the Unit Superintendent's understanding of the PRB actions on June 12, 1990, the Unit Superintendent simply used the date that he believed the TCP had been voided. This action was consistent with the Operations Department procedure coordinator's view of when the TCP had been voided by approval of the permanent procedure.

Georgia Power Company also believes the personal accountability of Operations Department personnel for violations in Licensee Event Reports (LERs) is totally irrelevant to the Unit Superintendent's actions. Further, the Unit Superintendent's lack of consideration of the 14-day requirement, notwithstanding his previous training, is readily understandable in light of the manner in which the TCP form was presented to him for written closeout and his depth of experience.

Corrective Steps Which Have Been Taken and the Results Achieved:

On June 22, 1990, a deficiency card (DC 1-90-282) was initiated to document that the Unit Superintendent incorrectly dated a temporary change procedure (TCP) with the date of June 12, 1990, rather than June 15, 1990.

A record correction notice (RCN) was initiated as part of the corrective action for the DC to correctly indicate the date on which the TCP form was processed.

The Unit Superintendent was counseled by the Operations Manager.

Corrective Steps That Will Be Taken to Avoid Further Violations:

Adherence to quality assurance record requirements has been reemphasized to plant personnel by written correspondence to the department managers from the General Manager.

Date When Full Compliance Will Be Achieved:

Compliance was achieved on August 14, 1990, when a RCN was initiated to correct the TCP form.