ENCLOSURE

FINAL SALP REPORT

U. S. NUCLEAR REGULATORY COMMISSION REGION II

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE INSPECTION REPORT NUMBERS 50-424/91-25 AND 50-425/91-25

GEORGIA POWER COMPANY

VOGTLE, UNITS 1 AND 2

OCTOBER 1, 1990 THROUGH SEPTEMBER 28, 1991

9203030259 920102 PDR ADDCK 05000424 0 PDR The licensee declared a notification of unusual event during the assessment period when a tornado was sighted in the owner controlled area of the plant on May 29, 1991. The event classification was prompt and correct, and offsite authorities were notified within requirements.

Three violations were cited.

Performance Rating

Category: 2

Recommendations

None

2.

- E. Security and Safetwards
 - 1. Analysis

This functional area addressed the adequacy of the security protection provided for the station's vital systems and equipment. The scope of this assessment included all licensee activities associated with access control, physical barriers, detection and assessment, armed response, alarm stations, power supply, communications, and compensatory measures for degraded security systems and equipment. The licensee's Fitness For Duty program was also inspected.

Early in the assessment period, the licensee was issued a civil penalty (\$50,000) due to a Severity Level III violation for breakdown in management oversight in the control of safeguards information. The licensee's corrective measures, directed by a multi-disciplined Task Force, were extensive and detailed. Measures included limiting the number of individuals authorized access to safeguards information, and tighter controls over the reproduction and distribution of such documents. These measures have been effective to date. Personnel from site and corporate who were responsible for the protection of safeguards information received aggressive retraining which appeared to have corrected numerous personnel errors.

In the previous SALP period, a Regulatory Effectiveness Review (RER) identified two safeguards inadequacies and four safeguards concerns in the security program. Several strengths in the security program were also identified. Licensee initiatives correcting RER concerns were found to be adequate. For example,

The licensee declared a notification of unusual event during the assessment period when a tornado was sighted in the owner controlled area of the plant on April 23, 1991. The event classification was prompt and correct, and offsite authorities were notified within requirements.

Three violations were cited.

2. Performance Rating

Category: 2

3. Recommendations

None

- E. Security and Safeguards
 - 1. Analysis

This functional area addressed the adequacy of the security protection provided for the station's vital systems and equiment. The scope of this assessment included all licensee activities associated with access control, physical barriers, detection and assessment, armed response, alarm stations, power supply, communications, and compensatory measures for degraded security systems and equipment. The licensee's Fitness For Duty program was also inspected.

Early in the assessment period, the licensee was issued a civil penalty (\$50,000) due to a Severity Level III violation for breakdown in management oversight in the control of safeguards information. The licensee's corrective measures, directed by a multi-disciplined Task Force, were extensive and detailed. Measures included limiting the number of individuals authorized access to safeguards information, and tighter controls over the reproduction and distribution of such documents. These measures have been effective to date. Personnel from site and corporate who were responsible for the protection of safeguards information received aggressive retraining which appeared to have corrected numerous personnel errors.

In the previous SALP period, a Regulatory Effectiveness Review (RER) identified two safeguards inadequacies and four safeguards concerns in the security program. Several strengths in the security program were also identified. Licensee initiatives correcting REP concerns were found to be adequate. For example,

The quality, technical content, and level of detail for plant modifications and other technical support activities was good, and has contributed to plant safety. A modification to the steam generator narrow range level indication system resulted in an expanded band of level indication, which allowed additional oberating margin. This additional margin enabled Unit 2 to withstand a main feed pump trip from 100% power without sustaining a reactor trip. A similar modification is being made on Unit 1. The installation of a radwaste microfiltration system focreased liquid radwaste processing capacity, and will lower the existing offsite release quantities. Reactor Enginee-ing recently made enhancements to the method of calculating estimated critical condition and shutdown margin using a computer program which provides a more accurate estimate than the manual calculation method.

Apart from the overall satisfactory performance, several engineering deficiencies were noted during this assessment period. Examples include failure to include Independent Verification steps in engineering department TS surveillances involving lifting safety related wires, and failure to include static head correction in pressure transmitter calibration procedures. In addition, the licensee failed to follow procedures for deviating from an approved 10 CFR 50.59 safety evaluation for a design change.

The operator training program has continued to be effective, as demonstrated by the results of Initial, Requalification, and Generic Fundamentals examinations. Initial examinations were given to 11 RO candidates and one SRO candidate, with 11 of 12 passing. One generic weakness noted was the inability of RO candidates to properly complete an Emergency Notification Procedure checklist. The requalification examinations resulted in 14 of 15 candidates passing. The Generic Fundamentals examinations resulted in 15 of 16 candidates passing. The licensee's simulator is certified in accordance with the American Nationa Standards Institute 3.5.

Two violations were cited.

2. Performance Rating

Category: 2

Trend: Improving

3. Recommendations

None

The quality, technical content, and level of detail for Name modifications and other technical support activities was good, and has contributed to plant safety. A modification to the steam generator narrow range level indication system resulted in an expanded band of level indication, which allowed additional operating margin. This additional margin enabled Unit 2 to withstand a main feed pump trip from 100% power without sustaining a reactor trip. A similar modification is being made on Unit 1. The installation of a radwaste microfiltration system increased liquid radwaste processing capacity, and will lower the existing offsite release quantities. Reactor Engineering recently made enhancements to the method of calculating estimated critical condition and shutdown margin using a computer program which provides a more accurate estimate than the manual calculation method.

Apart from the overall satisfactory performance, several engineering deficiencies were noted during this assessment period. Examples include failure to include Independent Verification steps in engineering department TS surveillances involving lifting safety related wires, and failure to include static head correction in pressure transmitter calibration procedures. In addition, the licensee failed to follow procedures for deviating from an approved 10 CFR 50.59 safety evaluation for a design change.

The operator training program has continued to be effective, as demonstrated by the results of Initial, Requalification, and Generic Fundamentals examinations. Initial examinations were given to 16 RO candidates and four SRO candidates, with 19 of 20 passing. One generic weakness noted was the inability of RO candidates to properly complete an Emergency Notification Procedure checklist. The requalification examinations resulted in 15 of 16 candidates passing. The Generic Fundamentals examinations resulted in 15 of 16 candidates passing. The licensee's simulator is certified in accordance with the American National Standards Institute 3.5.

Two violations were cited.

2. Performance Rating

Category: 2

Trend: Improving

3. Recommendations

None

The SAER group was effective in the identification of deficiencies and followup of corrective actions. Examples included a deficiency in the method of performing TS HVAC heater dissipation surveillances, improper approval of overtime, distribution and control problems with control room drawings, and Fitness for Duty program deficiencies. Management has taken timely and effective corrective action in response to SAER findings.

ISEG was also effective in identifying and/or resolving safety significant issues. Examples included a review of miswiring events occurring during maintenance, and an investigation of open sliding links. ISEG members frequently participated and lead event investigations. ISEG members have also been trained in and perform human factors evaluations.

The licensee's event investigation program was identified as a strength. The process was diffective in assession problems, determining root causes, and facommending corrective actions. One specific area which had been a weakness in the past was the investigations into EDG problems. This period, when several problems with the EDG voltage regulation and excitation system occurred, the licensee was aggressive in pursuing the causes of the problems and taking corrective action.

The licensee's Deficiency Card program was also effective in identifying, evaluating, reporting and dispasitioning problem. Deficiencies were reviewed for reportability, evaluated, an corrective actions taken in a timely manner. Beficiency cards were also reviewed by the Plant Review Board for safety concerns. This process resulted in several licensee identified violations.

One weakness was identified with implementation of a safety evaluation into operating procedures. The licensee failed to completely incorporate the specified actions in a safety evaluation for minimization of potential main feedwater water hammer after a design change to remove differential temperature indication and alarms.

Management decisions regarding safety were considered conservative. As discussed in Section IV.A, plant management made decisions to shutdown the units, although not required by regulations. Licensee decisions on TS interpretations were found to be safe and conservative. Plant management also improved the TS clarification program. Previously, TS clarifications had been performed by the Operations manager with no other review. These clarifications now receive additional review by the Technical Support manager. The SAER group was effective in the iden*ification of deficiencies and followup of corrective actions. Examples included a deficiency in the method of performing TS HVAC heater dissipation surveillances, improper approval of overtime, distribution and control problems with control room drawings, and Fitness for Duty program deficiencies. Management has taken timely and effective corrective action in response to SAER findings.

ISEG was also effective in identifying and/or resolving safety significant issues. Examples included a review of miswiring events occurring during maintenance, and an investigation of open sliding links. ISEG members frequently participated and lead event investigations. ISEG members have also been trained in and perform human factors evaluations.

The licensee's event investigation program was identified as a strength. The process was effective in assessing problems, determining root causes, and recommending corrective actions. One specific area which had been a weakness in the past was the investigations into EDG problems. This period, when several problems with the EDG voltage regulation and excitation system occurred, the licensee was aggressive in pursuing the causes of the problems and taking corrective action.

The licensee's Deficiency Card program was also effective in identifying, evaluating, reporting and dispositioning problems. Deficiencies were reviewed for reportability, evaluated, and corrective actions taken in a timely manner. Deficiency cards were also reviewed by the Plant Review Board for safety concerns. This process resulted in several licensee identified violations.

One weakness was identified with implementation of a safety evaluation into operating procedures. The licensee field to completely incorporate the specified actions in a mafety evaluation for minimization of potential main feedwater water hammer after a design change to remove differential to perature indication and alarms.

Management decisions regarding safet: were consisted conservative. As discussed in Section IV.A, plant matagement made decisions to shutdown the units, although not required by regulations. Licensee decisions on TS clarifications were found to be safe and conservative. Plant management also improved the TS clarification program. Previously, TS clarifications had been performed by the Operations manager with no other review. These clarifications now receive additional review by the Technical Support manager. ENCLOSURE 3

UNITED STATES NUCLEAR REGULATORY COMMISSION



SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP)

GEORGIA POWER COMPANY SALP CYCLE 10

OCTOBER 1, 1990 THROUGH SEPTEMBER 28, 1991

VOGTLE

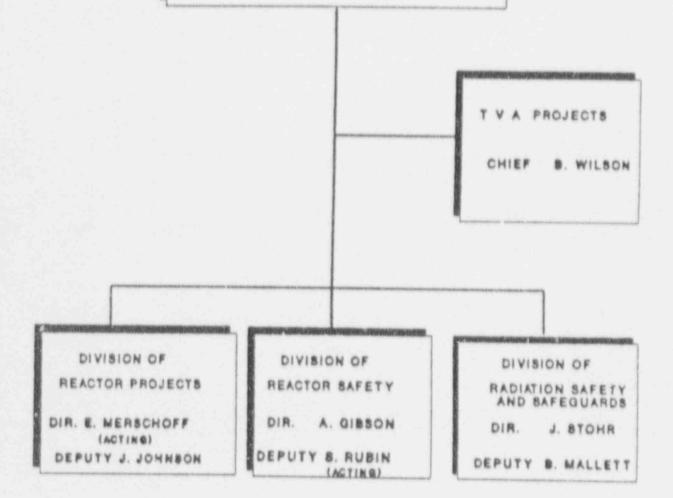
DECEMBER 4, 1991

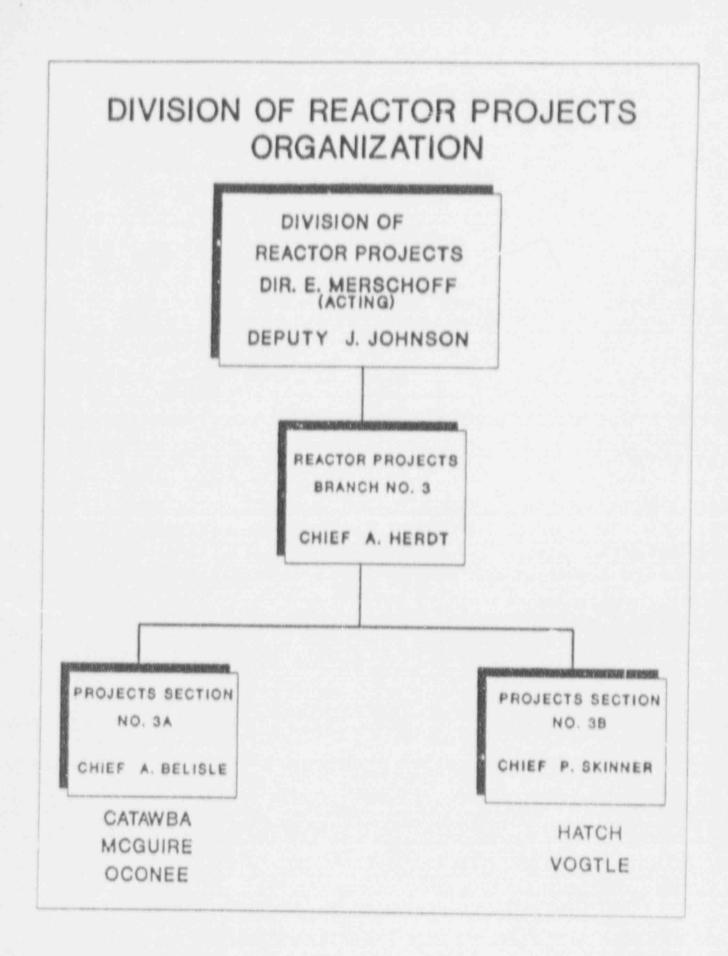
REGION II ORGANIZATION

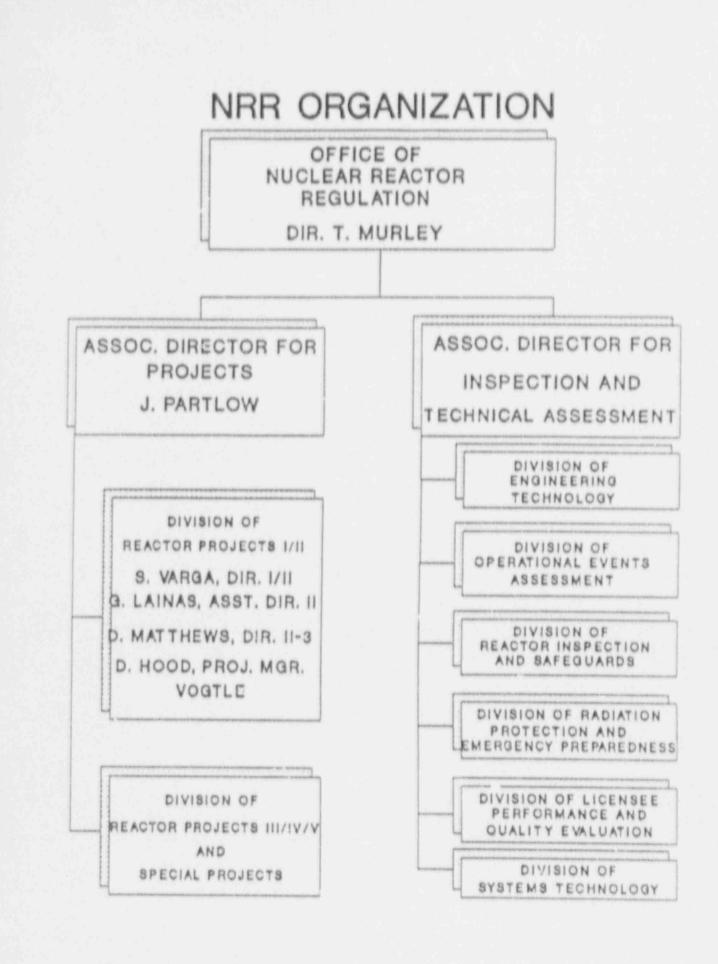
OFFICE OF THE ADMINISTRATOR

ADMINISTRATOR S. EBNETER

DEPUTY J. MILHOAN







ALK, "Helters, Kitt Bookins Sciences In

SALP PROGRAM OBJECTIVES

- 1. IDENTIFY TRENDS IN LICENSEE PERFORMANCE
- 2. PROVIDE A BASIS FOR ALLOCATION OF NRC RESOURCES
- 3. IMPROVE NRC REGULATORY PROGRAM

FOR OPERATING REACTORS

A. PLANT OPERATIONS

B. RADIOLOGICAL CONTROLS

C. MAINTENANCE/SURVEILLANCE

D. EMERGENCY PREPAREDNESS

E. SECURITY

F. ENGINEERING/TECHNICAL SUPPORT

G. SAFETY ASSESSMENT/QUALITY VERIFICATION

AREA PERFORMANCE CATEGORY 1

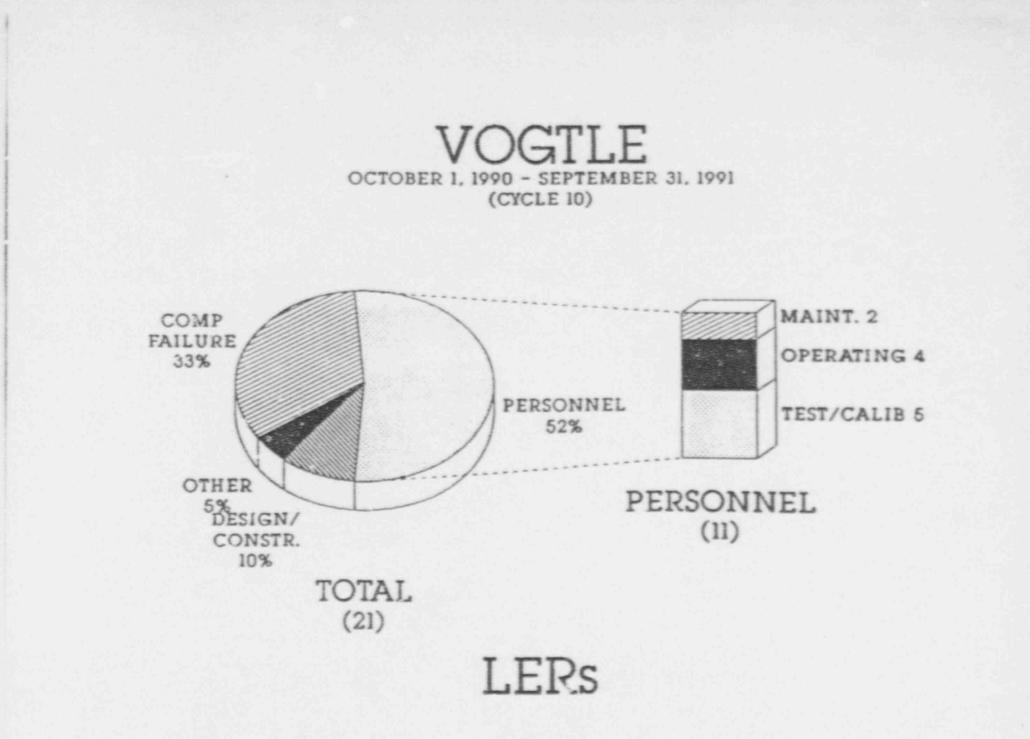
LICENSEE MANAGEMENT ATTENTION TO AND INVOLVEMENT IN NUCLEAR SAFETY OR SAFEGUARDS ACTIVITIES RESULTED IN A SUPERIOR LEVEL OF PERFORMANCE. NRC WILL CONSIDER REDUCED LEVELS OF INSPECTION EFFORT.

AREA PERFORMANCE CATEGORY 2

LICENSEE MANAGEMENT ATTENTION TO AND INVOLVEMENT IN NUCLEAR SAFETY OR SAFEGUARDS ACTIVITIES RESULTED IN A GOOD LEVEL OF PERFORMANCE. NRC WILL CONSIDER MAINTAINING NORMAL LEVELS OF INSPECTION EFFORT.

AREA PERFORMANCE CATEGORY 3

LICENSEE MANAGEMENT ATTENTION TO AND INVOLVEMENT IN NUCLEAR SAFETY OR SAFEGUARDS ACTIVITIES RESULTED IN AN ACCEPTABLE LEVEL OF PERFORMANCE; HOWEVER, BECAUSE OF THE NRC'S CONCERN THAT A DECREASE IN PERFORMANCE MAY APPROACH OR REACH AN UNACCEPTABLE LEVEL, NRC WILL CONSIDER INCREASED LEVELS OF INSPECTION EFFORT.



(CATEGORY 2)

OVERALL PERFORMANCE IN THIS AREA REMAINED GOOD

STRENGTHS

- OPERATOR PERFORMANCE
- MANAGEMENT INVOLVEMENT
- STAFFING
- MATERIAL CONDITION
- CORRECTIVE ACTIONS

OPERATIONS (CATEGORY 2) (CON'T)

CHALLENGES

- PERSONNEL ERRORS
- PROCEDURAL COMPLIANCE
- ATTENTION TO DETAIL IN FIRE PROTECTION

RADIOLOGICAL CONTROLS (CATEGORY 1)

OVERALL PERFORMANCE IN THIS AREA REMAINED EXCELLENT

STRENGTHS

- MANAGEMENT INVOLVEMENT
- EXPOSURE CONTROL
- RADWASTE CONTROL
- WATER CHEMISTRY CONTROL
- ENVIRONMENTAL MONITORING CHALLENGE
 - UNPLANNED RELEASES

MAINTENANCE/ SURVEILLANCE (CATEGORY 2)

OVERALL PERFORMANCE IN THIS AREA REMAINED GOOD

STRENGTHS

- PERSONNEL
- FACILITIES
- ENGINEERING SUPPORT
- PLANNING / SCHEDULING

MAINTENANCE/ SURVEILLANCE (CATEGORY 2) (CON'T)

CHALLENGES

- EQUIPMENT PERFORMANCE
- PROCEDURES
- HOUSEKEEPING
- PERFORMANCE OF SURVEILLANCES

EMERGENCY PREPAREDNESS (CATEGORY 2)

OVERALL PERFORMANCE IN THIS AREA IMPROVED TO GOOD

STRENGTHS

- ANNUAL EXERCISE PERFORMANCE
- IMPLEMENTATION OF CORRECTIVE
 ACTIONS
- EMERGENCY DRILLS

CHALLENGES

- EOF VENTILATION SYSTEM
- HANDLING MEDICAL EMERGENCIES
- TRAINING

(CATEGORY 2)

OVERALL PERFORMANCE IN THIS AREA IMPROVED TO GOOD WITH AN IMPROVING TREND NOTED

STRENGTHS

- CORRECTIVE ACTIONS
- PERFORMANCE
- TRAINING
- FITNESS FOR DUTY
- COMMUNICATIONS

CHALLENGE

CONTROL OF SAFEGUARDS
 MATERIAL

ENGINEERING/ TECHNICAL SUPPORT (CATEGORY 2)

OVERALL PERFORMANCE IN THIS AREA REMAINED GOOD WITH AN IMPROVING TREND NOTED

STRENGTHS

- COMMUNICATIONS
- IMPROVED CONFIGURATION
 CONTROL
- IMPROVED OUTAGE RISK MANAGEMENT
- PLANT MODIFICATIONS
- OPERATOR TRAINING

ENGINEERING/ TECHNICAL SUPPORT (CATEGORY 2) (CON'T)

CHALLENGES

- PROCEDURAL ADEQUACY
- CONTROL ROOM DRAWINGS

SAFETY ASSESSMENT/ QUALITY VERIFICATION (CATEGORY 2) OVERALL PERFORMANCE IN THIS AREA REMAINED GOOD

STRENGTHS

- MANAGEMENT INVOLVEMENT
- TECHNICAL CORRESPONDENCE
- TECHNICAL / SSESSMENTS
- CORRECTIVE ACTIONS

CHALLENGES

- PROCEDURAL COMPLIANCE
- ATTENTION TO DETAIL
 IN LICENSING

FACILITY PERFORMANCE SUMMARY VOGTLE - CYCLE 10

1

EUNCTIONAL AREA	RATING LAST	RATING THIS PERIOD
PLANT OPERATIONS (OPERATIONS & FIRE PROTECTIO	2 N)	2
RADIOLOGICAL CONTROLS	1	1
MAINTENANCE/SURVEILLANCE	2	2
EMERGENCY PREPAREDNESS	3 (1)	2
SECURITY	3	2 (1)
ENGINEERING/TECHNICAL SUPPORT (ENGINEERING, TRAINING & OUTA		2 (1)
SAFETY ASSESSMENT/ QUALITY VERIFICATION (QUALITY PROGRAMS & LICENSIN	2	2

torgia Poker Company Invertiess Center Parkway Jet Onice Box 1295 Birmingham, Alabarte 35201 Telephone 205 877-7122

ENCLOSUPE 4

C. K. McCoy vice President Nuclear Vogte Project Georgia Power

December 23, 1991

ELV-03330 1254

Docket Nos. 50-424 50-425

U. S. Nuclear Regulatory Commission ATTN: Mr. S. D. Ebneter, Regional Administrator Region II 101 Marietta Street, N.W. Atlanta, GA 30323

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP)

By letter dated November 25, 1991, Georgia Power Company (GPC) was provided a copy of the initial SALP report for the period of October 1, 1990 through September 28, 1991. This report was discussed with the NRC staff during a meeting on December 4, 1991. Georgia Power Company provided comments on the initial SALP report during that meeting, and we have no further comments.

Sincerely, C.K.M.C. C.K. McCoy

xc: Georgia Power Company Mr. W. B. Shipman Mr. M. Sheibani NORMS

> <u>U. S. Huclear Regulatory Commission</u> Mr. D. S. Hood, Licensing Project Manager, NRR Mr. B. R. Bonser, Senior Resident Inspector, Vogtle Document Control Desk

Enclosure 4

"COMMENTS ON VOGTLE 1991 SALP"

Section D.1

The first sentence on page 14 should be "April. 23. 1991"

Section F.1 The last paragraph, page 18, second sentence should read, "Initial examinations were given to <u>16 RO candidates and 4 SRO candidate</u>, with <u>19 of 20 passing"</u>. The fourth sentence should read, "The requalification examinations resulted in <u>15 of 16</u> candidates passing".

Section G.1 The third sentence of the last paragraph on page 21 should read, "Licensee discussions on Tech. Spec. clarifications were found......."