



OFFICE OF THE SECRETARY

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555

February 27, 1992

RELEASED TO THE PDR 2/27/92 J date initials

MEMORANDUM FOR: James M. Taylor Executive Director for Operations FROM: Samuel J. Chilk, Secretary SUBJECT: SECY-92-013 - GEORGIA POWER COMPANY, INTERVENOR'S APPEAL OF LBP-91-21

The Commission in CLI-92-03 has acted on an appeal filed by Georgians Against Nuclear Energy (GANE) from an Atomic Safety and Licensing Board decision, LBP-91-21, 33 NRC 419 (1991), which dismissed GANE's proposed contentions and denied the petition for intervention on amendments to Georgia Power Company's operating licenses for the Vogtle plants. The amendments permit the licensee to by-pass the high jacket-water temperature trip of the diesel generator under emergency start conditions. Although the Commission has issued an order dismissing GANE's appeal, the Commission requests the staff to provide the Commission additional information concerning operation of the diesel generators and their associated instrumentation. The Commission is requesting this information pursuant to its general supervisory authority and responsibility over safety matters.

Specifically, the staff is requested to provide the following information:

- 1) The staff should inform the Commission whether the licensee has replaced or plans to replace the Calcon pneumatic sensors used in Vogtle's diesel generator instrumentation. In this regard, the Commission notes that various documents filed before the Licensing Board indicate that the licensee was considering replacement of the sensors. If the Calcon sensors have not been replaced, the staff should explain the rationale for the continued acceptability of the sensors. 2) The staff should inform the Commission of the justification for the acceptability of mid-loop operation at Vogtle with a single available diesel generator. In this regard the Commission notes that the staff's safety evaluation for the amendment indicates that, if a diesel generator fails due to

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a loss of engine cooling, emergency onsite AC power would be provided by the redundant diesel generator and its associated electrical train. Only one diesel generator was, however, operable during the March 1990 Vogtle loss-of-power event.

- 3) The staff should inform the Commission of its views as to whether the guidance in Regulatory Guide 1.9, which permits reliance on operator action when certain diesel generator trips are bypassed, is necessary to meet, or goes beyond, the requirements of 10 CFR Part 50, Appendix A, Criterion 17. If the guidance goes beyond Appendix A requirements, are there other areas in the Regulatory Guide which also go beyond Appendix A requirements?

(EDO)

(SECY Suspense: 3/20/92)

Since the CLI-92-3 was issued, the Commission received an additional communication from GANE dated February 13, 1992. GANE's filing is hereby referred to the staff for review and appropriate response.

Attachment:
As stated

cc: The Chairman
Commissioner Rogers
Commissioner Curtiss
Commissioner Remick
Commissioner de Planque
OGC
OCAA
OIG
ACRS
DSB
PDR - Advance
DCS - P1-24

2/13/92

United States of America
Nuclear Regulatory Commission

In the Matter of:
Docket # 50-424-OLA
50-425-OLA
ALSBP #90-617-03-OLA
Appeal to Nuclear Regulatory Commission

OFFICIAL COMMUNICATION OF GEORGIANS AGAINST NUCLEAR ENERGY
WITH ADJUDICATORY EMPLOYEE JOHN L. KNOX

Georgians Against Nuclear Energy endorses the Commission's engagement of advisement on the issues relating to the diesel generators at Nuclear Plant Vogtle.

We request the Commission to perform an analysis of the testing history of the diesels at Plant Vogtle in order to provide information necessary for the Commission and John L. Knox to properly advise Georgia Power Company and assist them in solving their chronic problems with their TDI diesel generators.

It is our wish to obtain the diesel test results for the operating history of Vogtle and analyze them on behalf of the parties, however our efforts to obtain the documents have not borne fruit. It is our understanding that the NRC may acquire these documents from Georgia Power on request.

Our interest in the test results are driven by Appendix I, Section 3, of NUREG 1410 which shows myriad chronic problems with other Calcon sensors besides the high jacket water temperature switch which failed and caused the site area emergency on March 20, 1990. The lube oil low pressure sensor which has also repeatedly suffered calibration drift is still employed in emergency starts and its calibration drift problems pose a threat to the operability of the diesels.

Appendix J of Nureg 1410, p. J-27, contains a discussion of the problem of contamination of the diesels' pneumatic logic by thread sealant. This contamination has its roots in the high-maintenance needs and human intervention requirements of the pneumatic logic system. We believe the diesel testing information will support our position that,

rather than repair the pneumatic logic and risk subsequent random and sporadic failures that will arise from the same human mistakes that occurred on and prior to the site area emergency of March 20, 1990, that the safety of people living in the vicinity of Plant Vogtle will be better preserved by replacing the pneumatic logic on the diesels with a less vulnerable electronic logic which is more automated and less subject to human error.

In our early efforts to obtain the diesel testing history from Georgia Power, GANE received a communication from Georgia Power which referred to Diesel 2-A as having experienced 6 failures in 93 tests. This poor reliability record for Diesel 2-A reinforces our contention that the problems that the diesels are having are chronic and that the diesels should be repaired so that their reliability will be in conformance with the requirement to power the nuclear plant's safety systems in a dangerous loss-of-station power incident. A study of the failures of the diesels at Vogtle will ascertain whether the significantly reduced reliability of the diesels is due primarily to the pneumatic logic or whether the generator failures are caused by even more flaws in the diesels.

GANE requests that Georgia Power immediately establish the causes of the diesel failures and effect repairs to the four emergency diesel generators at the nuclear plant.

GANE appreciates your continued attention to this matter and hopes that the parties will agree to repair the diesels before another serious loss-of-power accident occurs.

Respectfully submitted,



Glenn Carroll for
Georgians Against Nuclear Energy

Dated and signed in Decatur, Georgia
February 13, 1992

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