

D. O. Foster  
Vice President and Project  
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Vogtle Project

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June 11, 1984



United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region II - Suite 3100  
101 Marietta Street  
Atlanta, Georgia 30303

File: X7BG10  
Log: GN-373

Reference: 50-424/84-09, 50-425/84-09

Attention: Mr. R. C. Lewis

Gentlemen:

The Georgia Power Company wishes to submit the following information concerning the violation discussed in your inspection report 50-424/84-09 and 50-425/84-09:

Violation 50-424, 425/84-09-01, "Failure to Document Surveillance Inspections on the Fire Water Protection System" - Severity Level V.

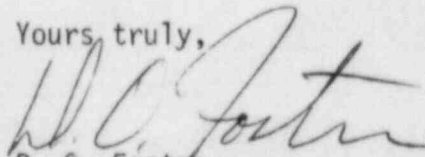
- (1) Georgia Power Company acknowledges that mechanical equipment installation surveillances for fire protection systems were not documented in accordance with Procedure QC-T-11, Revision 1, when Unresolved Item 83-20-01 was identified during NRC Inspection 50-424, 425/83-20 (October 25-28, 1983). It should be noted, however, that Revision 2 of Procedure QC-T-11, which effectively clarified the intended purposes of the mechanical surveillance program and the documentation requirements for these surveillances, was issued on January 18, 1984, to resolve the concerns of Unresolved Item 83-20-01. Subsequent to these corrective actions, during NRC Inspection 50-424, 425/84-09 (April 17-20, 1984), Unresolved Item 83-20-01 was upgraded to a Violation.
- (2) Procedure QC-T-11, "Mechanical Surveillance Program", was developed to provide direction and guidance to the Georgia Power Company Surveillance Section in performing routine surveillance of mechanical equipment installation activities performed by site contractor organizations with their own quality assurance/quality control (QA/QC) programs. The purpose of the mechanical surveillance program is to monitor contractor work activities on an informal basis to ensure that installation and testing of mechanical equipment is conducted in accordance with approved procedures, specifications, drawings, and codes; thereby evaluating the contractors' fulfillment of its contractual

obligations to the Georgia Power Company. It was never intended that the mechanical surveillance program be considered part of the Georgia Power Company Quality Assurance Program or of the Vogtle Project Fire Protection Quality Assurance Program. Under the Georgia Power Company Quality Assurance Program, contractor QA/QC programs are reviewed, approved, monitored and evaluated through the Quality Assurance Auditing Program.

- (3)&(4) Revision 1 of Procedure QC-T-11 was revised and reissued on January 18, 1984. The following clarifications regarding the intended purpose and use of the mechanical surveillance program were made:
- a. The mechanical surveillance program applies to all contractor QA/QC programs to the extent considered necessary by Georgia Power Company QC management.
  - b. Results of surveillances may be documented by the inspector in a personal field book or other appropriate method. Surveillance documentation is retained as considered necessary by Georgia Power Company QC Management and is not considered permanent quality assurance records.
  - c. Discrepancies or deviations noted during surveillances are documented and dispositioned in accordance with Procedure GD-T-01, "Nonconformance Control," which provides for permanent quality assurance records for the identification, evaluation, and resolution of nonconforming items.
- (5) Full compliance with applicable requirements was achieved with the revision and reissuance of Revision 2 of Procedure QC-T-11 on January 18, 1984.

This response contains no proprietary information and may be placed in the NRC Public Document Room.

Yours truly,



D. O. Foster

REF/DOF/tdm

xc: U. S. Nuclear Regulatory Commission  
Attn: Victor J. Stello, Jr., Director

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