

A-125 (corrected)

Copy for Larry

60-125

DOCKETED
USNRC

Georgia Power

Interoffice Correspondence

95 JUL 27 P4:40

DATE: August 23, 1990

RE: Vogtle Electric Generating Plant
NRC Areas of Concern
Log: SRBS-00044
Security Code: NC

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

AUG 23 1990
RECEIVED

FROM: M. J. Ajluni

TO: Distribution

Attached for your information is a copy of the recent NRC Operational Safety Inspection areas of concern and VEGP's position.

Mark J. Ajluni

M. J. Ajluni

MJA/ghj

- cc: W. B. Shipman
- G. Bockhold, Jr. ✓
- S. C. Ewald
- L. K. Mathews
- C. C. Miller
- W. C. Ramsey
- P. D. Rushton
- NORMS
- SRB File

9508140183 950719
PDR ADOCK 05000424
G PDR

NUCLEAR REGULATORY COMMISSION *CRC*

Docket No. 50-424/425-OLA-3 EXHIBIT NO. *II-125*

In the matter of Georgia Power Co. et al., Vogtle Units 1 & 2

Staff Applicant Intervenor Other
 Identified Received Rejected Reporter *KHW*
Date *7/19/95* Witness *Mosbaugh*

NUCLEAR PLANT VOGTLE UNITS 1 & 2		
ROUTING	ACTION	COPY
GM		
AGM-OPS		
AGM-SUPPORT		
FIN SVC		
OPERATIONS		
MAINTENANCE		
HP/CHEMISTRY		<i>YES</i>
OBP		<i>WAF</i>
ENG SUPPORT		<i>ALL</i>
TECH SUPPORT		<i>UAC</i>
TRAINING		<i>WAF</i>
ISER/SAR		<i>UAC</i>
ADMIN/SECURITY		<i>WAF</i>
		<i>GAM/GR</i>
ACTION DUE		

AUGUST 17, 1990

AREAS OF CONCERNIS

NRC

VEGP CONTACT

CORPORATE CONTACT

<u>AREAS OF CONCERNIS</u>	<u>NRC</u>	<u>VEGP CONTACT</u>	<u>CORPORATE CONTACT</u>
* D/G Records Starts/Failures	Pete Taylor	G. Frederick	
* 3/1/90 S R Monitor Inop Mode Change	Neal Hunemuller	JES/D. Carter	
* Missed Surv. Cont. Isol.	Neal Hunemuller	JES/S. Swanson	
* March 15 RHR Train B	Ron Aiello	JES/J. Gasser	P. D. Rushton
* Temp. Change Notice to AOP 18028-C-7-90-1	Robert Carrol	JES/J. Cash	
* ESFA Sequencer Out of Service	Robert Carrol	JES/Horton	J. A. Bailey
* Alternate Radwaste Building	Ron Aiello	Ron LeGrand/JES	P. D. Rushton
* Snubber Reduction/ LCO Action Statement	Larry Garner	Gus Williams	Ward/Stringfellow
* Cont. Integrity Hydrogen Monitor Valve Opened	Morris Branch	Dean Gustafson	Ward/Stringfellow
* Precision Heat Balance	Morris Branch	Gus Williams	B. Florian
* Personnel Accountability Methodology for Reporting	C. VanDenburgh	JES/GB	
* Tech. Spec. 3.0.3 Philosophy	J. D. Wilcox	J. E. Swartzwelder	J. Stringfellow
* ESFAS Reportability	J. D. Wilcox	R. M. Odom	J. A. Bailey
* Plant Review Board (PRB) Composition	C. VanDenburgh	G. Bockhold	
* Tech. Specs. Interpretation	Morris Branch	J. E. Swartzwelder	J. Stringfellow
* Overtime/Training & Qualification	Larry Garner	J. E. Swartzwelder	
* Electrical Separation Zone 80	Larry Garner	M. Horton	P. D. Rushton
* T. S. 3.4.7.3 CCW	J. D. Wilcox	J. E. Swartzwelder	

- * Training Department Comments on OSTI
- * Shift Experience
- * Plant Equipment Operator Morale
- * Shift Communications
- * Analyzer Operation Following SI
- * Chilling Affect/Intimidation of PRB Members
- * Quality Concern Program
- * Conflicting Statements
- * While Containment Cooler is Inoperable
DGIB is Rendered Inoperable
- * Exit of Diesel Generator LCO
- *

NRC Concern

1. The NRC is concerned about the incorrect number of diesel starts reported in LER 1-90-06 and the number of starts presented to the NRC on April 9, 1990 and in the confirmation response letter of April 9, 1990. The major issue remaining is to try and determine through personal interviews, how the number of 19 for diesel 1B was arrived at in the April 9 letter to the NRC. The NRC believes the intent of the April 9 letter and the presentation discussed consecutive successful starts. The revised response to LER 90-06 did not clarify the number of starts reported to the NRC April 9, and did not clarify that the 19 starts were not consecutive.
2. The inspector noted that documentation provided by Operations to support diesel trending (14980-C and 13145-C data sheets) does not contain an adequate description of what happens during the start attempt. The plant is not interpreting Reg Guide 1.108 properly with regard to reporting valid and non-valid failures. There may be valid and non-valid failures that were not reported. The NRC does not consider the current status of reporting diesel failures to be in compliance with commitments made to the NRC in Violation 50-424/87-57.

NRC Documentation

The NRC has reviewed the diesel start log and supporting documentation (14980-C and 13145-C data sheets). The NRC currently believes some problems identified on 14980's and 13145's should be classified as non-valid failures and reported to the NRC. The NRC has requested and received written analysis to explain the disposition of the following 1B diesel starts: #'s 123, 124, 132, 133, 134, 136, 160, 161, 162, 164, 165, and 190. LER 1-90-06, revision 1; QA Audit Report OP26-90/33; QA Audit Report OPO9-90/31; and Special Report 1-90-05, dated August 7, 1990; GPC confirmatory action letter dated April 9, 1990.

VEGP Position

1. The error made in the number of diesel starts reported to the NRC on April 9, 1990, and in LER 1-90-06 is attributed to two factors:
 - a. The testing as described in LER 90-06, revision 0, was in the "context of" and "in reference to" the diesel control systems. The first two sentences of the 5th paragraph explain actions taken with regard to sensor calibrations and control system testing. In this context, the test program correlates to testing discussed with the NRC on April 9, 1990, and reported in the April 9, 1990, confirmatory letter. The LER 90-06 comment of "subsequent to the test program" was not intended to exclude successful diesel starts before declaring the diesel operable. As a result, diesel starts after testing of the control systems, but before a declaration of operability were counted. The transmittal letter for LER 90-06, revision 1, describes the confusion and attempts to clarify the concern by redefining the types of starts and the point of counting.

DIESEL STARTS AND FAILURE REPORTING

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- b. LER 90-06, revision 1, was intended to clarify any inadvertent "misleading" of the NRC on successful operation of the diesel control systems. When Vogtle Management was aware of the problem in LER 90-06, revision 0, management notified the NRC Residents. Also at the corporate office on 6/11/90, W. Shipman contacted Ken Brockman and on about 6/11/90, M. G. Hairston, III, contacted Mr. S. Ebner of NRC Region II. The revised LER was submitted on 6/29/90.

The 19 starts discussed on April 9 were based on operator assessments of the starts as successful using VEGP procedures. Additional review of these starts by both the NRC and Vogtle personnel indicates start #134 performed on March 23, 1990, could be counted as unsuccessful. If start #134 is not counted, only 14 successful starts occurred before April 9, 1990. This start will be reviewed in detail and an appropriate report to clarify the number of starts reported April 9, 1990 will be made.

2. After a thorough review of Reg Guide 1.108, Engineering Support (Mike Horton) agreed that all diesel start problems have not been reported as failures. GPC's response to NRC Violation 424/87-57 committed to report such equipment problems as failures; however, due to internal administrative problems, the commitment was not implemented. Engineering Support intends to review diesel start records for any unreported failures.

VEGP Documentation

- o LER 1-90-06, revision 1; QA Audit Report OP26-90/33; QA Audit Report OPO9-90/31; and Special Report 1-90-05, dated August 7, 1990; GPC confirmatory action letter dated April 9, 1990.
- o 1B diesel start analysis available 8/15/90 and Reg Guide 1.108 position from Engineering Support.

and SCNOSP Management

Vogtle Management was made aware of the failures on starts #134 and #132 prior to submitting the LER. They were informed of the failures on about 4-19-90.

Vogtle Management was made aware of the inaccurate information in LER-90-06 on 4-30-90 by memo to the general manager.

John Avramopoulos contacted the NRC residents on his own (not at GPC's direction) on about 6-1-90.

A revised LER had been generated and sent to SCNOSP by the PRB by 5-15-

As a minimum, start #132 and #134 should be counted as unsuccessful as records clearly show the DG tripped. Also start #130 could be counted as unsuccessful.

Response to NRC Question Concerning Diesel Starts Reported on April 9, 1990 and in LER 90-06, Revisions 0 and 1

8/22/90
Time: 13:00

Question #1

1. Who prepared the slide for the 4/9/90 presentation?

Answer: G. Bockhold, Jr., J. P. Cash, and K. Burr working as a group.

2. Who approved use of the slide?

Answer: G. Bockhold, Jr.

J.P. Cash was fully aware and knowledgeable that start #132 resulted in a diesel trip when he counted the starts. He demonstrated that knowledge in the critique meeting on 3-23-90 and counted the starts on the weekend of 4-7-90.

Question #2

1. Who prepared the confirmatory letter of April 9, 1990?

Answer: C. K. McCoy, J. A. Bailey, W. G. Hairston, III as a group.

2. Who approved the letter?

Answer: W. G. Hairston, III

Question #3 (with regard to LER 90-06, revision 0, dated 4/19/90)

1. Who prepared the LER?

Answer: Several draft revisions of the LER were prepared by Tom Webb and others of the NSAC group of the Vogtle Site Technical Support. These drafts were reviewed and commented on by the Plant Review Board. The final revision of LER 90-06, revision 0 was prepared by a phonecon between site management and corporate management. Those participating are believed to be G. Bockhold, Jr., A. L. Mosbaugh, J. G. Aufdenkampe, W. Shipman.

When this sentence was discussed in meetings the week of 8-13-90 with McCoy present, McCoy did not identify himself to be added to the list.

2. Who reviewed the LER?

Answer: All revisions of the LER were reviewed by the PRB and the General Manager-Plant Vogtle.

There were other participants than listed, including McCoy and Morrison and Jack Stringfellow. Mc Donald was continuously being briefed by someone personal and had direct input to revisions.

3. Who approved the LER?

Answer: The LER was approved by W. G. Hairston, III

All revisions and (revisions to revisions) were not reviewed by the PRB prior to submittal. For example the final version discussed on the reference phonecon was not PRB reviewed before signed by Hairston, on 4-19-90.

Question #4

1. Who prepared the cover letter for LER 90-06, revision 1?

Answer: The cover letter was prepared by H. W. Najors of the corporate staff. This letter was prepared under the guidance of W. G. Hairston.

2. What was the purpose (intent) in the wording of the cover letter with regard to the number of diesel starts?

Answer: The cover letter was intended to document discussions with NRC Region II to clarify the starts documented in LER 90-06, revision 0. By picking a well defined point to specify "subsequent to the test program" it was possible to identify a substantial number of successful diesel starts. This was intended to remove any additional ambiguity.

Question #5

1. Who in corporate added the words "subsequent to the test program" in LER 90-06, revision 0?

Answer: Corporate Licensing personnel in conjunction with the phone conversation described above made editorial changes as directed. Those present during the phone conversation are thought to be W. Shipman, G. Bockhold, Jr., A. L. Mosbaugh, J. G. Aufdenkampe, and J. Stringfellow.

Bill Shipman picked this phrase on the phone call.

There were other participants than listed including McCoy and Morrison and Jack Stringfellow.