

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of
GEORGIA POWER COMPANY, et al.
(Vogtle Electric Generating Plant
Units 1 and 2)

) Docket Nos. 50-424-OLA-3 27 P2:43
) 50-425-OLA-3
) Re: Licensee Amendment
) (Transfer to Southern Nuclear)
)
)

INTERROGATORY RESPONSE OF KENNETH E. BROCKMAN
TO THE OCTOBER 8, 1993, GEORGIA POWER COMPANY'S
FIRST SET OF INTERROGATORIES AND SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS TO THE NRC STAFF

STATE of MARYLAND)
COUNTY of MONTGOMERY)

Kenneth E. Brockman, having first been duly sworn, hereby states as follows:

I am employed by the Nuclear Regulatory Commission as Chief, Incident Response Branch, Division of Operational Assessment, Office for Analyses and Evaluation of Operational Data.

In the Spring of 1990, I was Chief, Reactor Projects, Section 3B, Division of Reactor Projects, NRC, Atlanta, Georgia. On October 7, 1993, Georgia Power Company (GPC) served interrogatories upon the NRC which called for information I possessed between March 20, 1990 and April 19, 1990. I have been informed in general terms by Staff counsel that the interrogatories result from an administrative proceeding in which the intervenor has alleged that GPC knowingly submitted incorrect information to the NRC regarding Emergency Diesel Generator (EDG) starts following the March 20, 1990, site incident (Licensee Event Report (LER) 90-06 and at a meeting in NRC's Atlanta, Georgia office on April 9, 1990). Having been so informed as to the background of the interrogatories, I respond here to those interrogatories which refer to me.

NUCLEAR REGULATORY COMMISSION

Docket No. 50-424/425-OLA-3 EXHIBIT NO. In + II-58
In the matter of Georgia Power Co. et al., Vogtle Units 1 & 2
 Staff Applicant Intervenor Other
 Identified Received Rejected Reporter CR
Date 07-06-95 Witness Mosbaugh

INTERROGATORY 1

Describe in detail the information or knowledge obtained by the following persons on or before April 9, 1990, regarding Plant Vogtle Unit 1 emergency diesel generator problems associated with diesel generator sensors/switches after March 20, 1990:

RESPONSE

I was present at the meeting held in Atlanta, Georgia on April 9, 1990 between GPC and NRC. By April 9, 1990, I was aware that the Vogtle Emergency Diesel Generators (EDGs) had not always started and operated as expected. See Appendices I and J to NUREG-1410. At the April 9, 1990 meeting, I heard Mr. Bockhold's presentation regarding starts of the 1A and 1B EDGs. I was unaware that the numbers he presented were incorrect, if they were, since I had no reason at that time to challenge the accuracy or veracity of those numbers. I, personally, never compiled a list of starts, or attempted starts, of either of the Vogtle EDGs, nor did I ever see such a list from the licensee. I was aware that the licensee, in association with the vendor, was investigating why EDG 1A tripped twice on March 20, 1990, and whether there were similar problems with the 1B EDG. I was aware that the CALCON pressure switches used in the protective circuitry of the diesels was being carefully analyzed. I was also aware that the licensee had conducted several (exact number unknown) of investigatory start attempts of the diesels as part of their analysis process.

INTERROGATORY 2

Describe in detail the additional information or knowledge obtained by the following persons on or before April 19, 1990, regarding Plant Vogtle Unit 1 emergency diesel generator problems associated with diesel generator sensors/switches after March 20, 1990:

RESPONSE

I recall that licensee personnel were actively investigating the cause of the failure of the Unit 1 EDGs (associated with the March 20, 1990 Loss of Offsite Power event) and that, as part of the investigation, they started or attempted to start the diesels several times. However, at that time, I had not, personally, made a tabulation of starts or attempted starts. Details concerning the testing program and the analytical processes being pursued were being followed by the Incident Investigation Team and the Region II support staff member (M. Hunt) dedicated to that task.

INTERROGATORY 3

Describe in detail Kenneth E. Brockman's entire recollection of the substance and circumstances of the following telephone conversations:

- A. All calls between Mr. Brockman and C. Kenneth McCoy, GPC, in the late afternoon on April 19, 1990.
- B. All calls between Mr. Brockman and Mr. McCoy on or about May 24, 1990, concerning diesel generator starts or problems.
- C. All calls between Mr. Brockman and William B. Shipman, GPC, on or about June 14, 1990, concerning diesel generator starts or problems.
- D. All calls between Mr. Brockman and Mr. McCoy on or about June 29, 1990, concerning diesel generator starts or problems.
- E. Identify all documents which in any way relate to the foregoing telephone conversations.

RESPONSE

With respect to the specific calls which are referenced by the interrogatory, I have maintained no personal or official records concerning specific conversations on specific days. My response, therefore, is generically oriented. I have no documents which relate to the phone conversations mentioned in the interrogatory.

Prior to the April 9, 1990 meeting with GPC, concerning the corrective actions that had been taken in response to the Loss of Offsite Power at the Vogtle Electric Generating Plant (VEGP) on March 20, 1990, I discussed with Mr. C. K. McCoy the need for GPC to provide specific information concerning the breadth and depth of their testing program for the EDGs. I emphasized that the Region II management would need to be confident that the problems experienced on March 20, 1990 had been properly corrected before a return to power operation (relief from the Confirmation of Action

Letter of March 23, 1990) would be approved. Verification of acceptable repairs would require confirmatory testing and the results of this testing would have to be presented to NRC management. Such information was included in the GPC presentation and the GPC letter of April 9, 1990.

Subsequent to the April 9, 1990 presentation, numerous concerns arose concerning the accuracy of the reported starts of the EDGs. On several occasions Mr. McCoy (and others) and I discussed how the numbers which were presented by GPC for EDG starting frequency were arrived at. It was obvious, and admitted, that the plant was having difficulties in making the reported numbers equate with log entries and testing records. I had several conversations with Messrs. McCoy and Shipman over the next 2 months. The essence of the conversations was that the information presented by GPC on April 9 was, possibly, not complete. The logs and records of the VEGP staff were confusing and the information collection process was, at best, hurried. There were discrepancies between what the definition of a "start" and a "failure" were. Messrs. McCoy and Shipman noted that the troubleshooting process was not included in the information presentation of April 9. (By not including the starts associated with such troubleshooting a "full and complete picture" was, therefore, not given at the April 9 presentation.)

Subsequently, Mr. McCoy also mentioned that the LER (or the revision??) that was going to be submitted by GPC was going to report the number of "valid tests" (as defined in the NUREG for EDG testing) which had been experienced on the 1A and 1B EDGs. This would, supposedly, provide a definitive criteria by which all concerned

parties would be able to understand what was being reported. I told Mr. McCoy that I understood what they (GPC) would be reporting but emphasized that my understanding was not a statement of agreement with respect to the adequacy of the reporting. GPC needed to be sure that their report provided a full and complete picture of the incident and the corrective actions that were subsequently undertaken.

INTERROGATORY 4

With respect to the telephone conversation between Messrs. Brockman and McCoy in the late afternoon of April 19, 1990, answer the following questions:

A. Does Mr. Brockman deny that, during the call, Mr. McCoy and Mr. Brockman discussed paragraph (g) of page three of GPC's April 9, 1990, letter to the NRC? If the answer is yes, please explain the basis for that answer.

B. Does Mr. Brockman deny that, during the call, Mr. McCoy confirmed that Mr. Brockman understood the Vogtle 1B diesel had experience problems and failures in the process of coming out of maintenance after March 20, 1990? If the answer is yes, please explain the basis for that answer.

C. Does Mr. Brockman deny that, during the call Mr. McCoy explained that the third paragraph of page six of GPC's April 19, 1990, LER meant that there were at least 18 starts of each diesel following completion of the sensor calibrations and logic testing, i.e., once all the bugs had been worked out of the machines after overhaul? If the answer is yes, please explain the basis for that answer.

D. Does Mr. Brockman deny that, during the call, Mr. Brockman confirmed to Mr. McCoy that he understood GPC's definition of "comprehensive test program of the diesel generator control systems," as that term was used in the April 19, 1990 LER? If the answer is yes, please explain the basis for that answer.

RESPONSE

With respect to the detailed questions provided above, since I have not retained any records of daily phone calls, I can neither confirm nor deny what transpired between Mr. McCoy and myself on the specific days in question. However, I can attest to my understanding, generically, of the matters addressed.

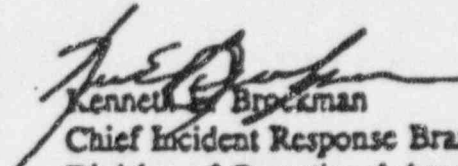
I did understand and Mr. McCoy did confirm that the Vogtle 1B EDG had experienced problems and failures in the process of coming out of maintenance. I also knew of these difficulties because of my position as the Regional Point of Contact for the Vogtle ITT. Also, the LER, submitted on April 19, 1990, indicated that there were, at least, 18 successful starts of the EDGs following completion of the test program.

However, I understood this to mean that there were no unexpected failures of the EDGs. To me, this meant that expected failures used to clarify and specify the particular failure mechanisms being experienced were not included in the count, but after repairs had been made all starts were successful and no failures were experienced that required the analysis and repair process to be re-entered or re-initiated.

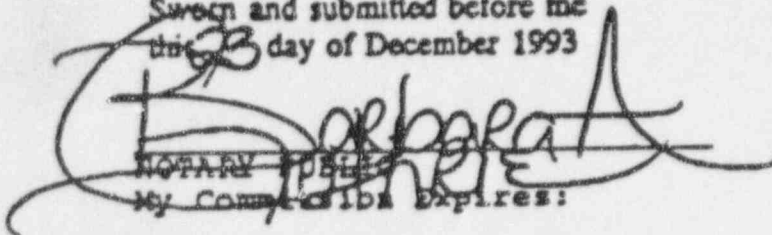
My understanding of VEGP's comprehensive test program was described in my response to Interrogatory #3. It was a detailed program by which all of the repairs and modifications were verified to be effective and complete. My understanding of the information presented by Mr. McCoy, et al., was that at no time during the verification process were any failures experienced.

These responses are true and correct to the best of my knowledge and belief.

Respectfully submitted,


Kenneth E. Brockman
Chief Incident Response Branch
Division of Operational Assessment
Office for Analyses and Evaluation
of Operational Data

Sworn and submitted before me
this 23 day of December 1993


NOTARY PUBLIC
My Commission Expires:

BARBARA A. GUTHRIE
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires February 8, 1996

