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USNRC

August 30, 1990 07 SEP 6 P 2:54 in electric system

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W. G. Hairston, III
Senior Vice President
Nuclear Operations

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

ELV-02059
0579

Docket No. 50-424 C

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

NUCLEAR REGULATORY COMMISSION
Docket No. 50-424/425-OLA-3 EXHIBIT NO. Int. 67
In the matter of Georgia Power Co. et al, Vogtle Units 1 & 2
 Staff Applicant Intervenor Other
 Identified Received Rejected Reporter CR
Date 05-17-95 Witness Simulated

Dear Mr. Ebnetter:

**VOGTLE ELECTRIC GENERATING PLANT
CLARIFICATION OF RESPONSE TO CONFIRMATION
OF ACTION LETTER**

By letter dated April 9, 1990 (ELV-01516), Georgia Power Company (GPC) responded to a Confirmation of Action Letter dated March 23, 1990. In that letter and in our meeting notes, GPC reported that Diesel Generator (DG) 1A had been started 18 times and DG 1B had been started 19 times with no failures or problems between March 20 and April 9, 1990. Similar information was reported in Revision 0 of Licensee Event Report (LER) 50-424/1990-006 dated April 19, 1990 (ELV-01545). As reported in our telephone calls to the NRC, we subsequently discovered that this information was in error.

In Revision 1 to LER 50-424/1990-006 dated June 29, 1990 (ELV-01729), GPC attempted to clarify the correct number of DG starts occurring in this time period by using regulatory guide terminology (i.e., valid vs. successful starts). This revised LER accurately reports the number of valid DG starts during the period of March 21 through June 7, 1990. However, during a recent NRC inspection it was pointed out that the revised LER did not adequately clarify the numbers in the April 9th letter.

The confusion in the April 9th letter and the original LER appear to be the result of two factors. First, there was confusion in the distinction between a successful start and a valid test. For the purpose of this letter, a start was considered successful when the DG was started and either ran or was intentionally shut down due to testing in progress, as identified on the attached tables. Our use of the term "successful" was never intended to imply a "valid successful test" in the context of Regulatory Guide 1.108. Many start attempts were made to test the DG's 1A and 1B using applicable operating procedures. These procedures and data sheets do not contain criteria for determining if a start is successful which resulted in determinations of success which were inconsistent with the above definition. Second, an error was made by the individual who performed the count of DG starts for the NRC April 9th letter.

Intervenor #36
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The purpose of this letter is to correct the figures related to the number of DG starts reported in the April 9th letter. Attached are tables 1 and 2 which summarize the DG starts for the period indicated. For DG 1A, there was a total of 31 start attempts and 29 of these attempts were considered successful after the two failures associated with the March 20 event. For DG 1B there was a total of 29 start attempts and 21 of these attempts were considered successful. Further, for DG 1B there were 12 successful sequential starts. —

Sincerely,

C.K. MCG FOR
W. G. Hairston, III

— WGH, III/NJS/gm

Attachments —

xc: Georgia Power Company
Mr. C. K. McCoy
Mr. G. Bockhold, Jr.
Mr. R. M. Odom
Mr. P. D. Rushton
NORMS

U. S. Nuclear Regulatory Commission
Document Control Desk
Mr. T. A. Reed, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

TABLE 1

DIESEL GENERATOR 1A

<u>START No.</u>	<u>DATE</u>	<u>SUCCESS</u>	<u>RUN TIME</u>	<u>UNPLANNED TRIP</u>	<u>DISCUSSION</u>
139	03-20-90	No	1 min	Yes	Failure to maintain load.
140	03-20-90	No	1 min	Yes	Failure to maintain load.
141	03-20-90	Yes	4 1/2hr	No	Manual start, load maintained.
142	03-20-90	Yes	45 min	No	Normal reserve auxiliary transformer swap method.
143	03-20-90	Yes	5 min	No	Observation run.
144	03-20-90	Yes	20 min	No	Observation run.
145	03-23-90	Yes	60 min	No	Observation run.
146	03-23-90	Yes	0 min	No	Started wrong diesel generator.
147	03-29-90	Yes	50 min	No	UV test start #1.
148	03-30-90	Yes	2 hr	Yes*	Bubble test #1, high temperature jacket water sensor vented.
149	03-30-90	Yes	6 min	No	Trip simulation test.
150	03-30-90	Yes	6 min	No	Trip simulation test.
151	03-30-90	Yes	3 min	No	Trip simulation test.
152	03-30-90	Yes	6 min	No	Trip simulation test.
153	03-30-90	Yes	4 min	No	Orifice modification functional test.
154	03-30-90	Yes	10 min	No	Orifice modification functional test.
155	03-31-90	Yes	2 min	No	Orifice modification functional test.
156	03-31-90	Yes	3 min	No	Orifice modification functional test.
157	03-31-90	Yes	10 min	No	Bubble test #2
158	03-31-90	Yes	1 min	No	Sensor trip timing test.
159	03-31-90	Yes	1 min	No	Sensor trip timing test.
160	03-31-90	Yes	2 min	No	Sensor trip timing test.
161	03-31-90	Yes	1 min	No	Sensor trip timing test.
162	03-31-90	Yes	75 min	No	Sensor trip timing test
163	03-31-90	Yes	27 min	No	UV test start #2.
164	04-01-90	Yes	1 1/2 hr	No	Normal surveillance test.
165	04-06-90	Yes	1 min	No	Jacket water temperature test.
166	04-06-90	Yes	1 min	No	Jacket water temperature test.
167	04-06-90	Yes	10 min	No	Jacket water temperature test.

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TABLE 1 (CONTINUED)

DIESEL GENERATOR 1A

<u>START</u> <u>No.</u>	<u>DATE</u>	<u>SUCCESS</u>	<u>RUN</u> <u>TIME</u>	<u>UNPLANNED</u> <u>TRIP</u>	<u>DISCUSSION</u>
168	04-06-90	Yes	2 1/2 hr	No	LOSP trip modification functional test.
169	04-09-90	Yes	1 3/4 hr	No	Normal surveillance test.

* Unit tripped during bubble testing due to one sensor venting and another sensing line being disconnected for testing. This is further described in NUREG-1410.

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TABLE 2

DIESEL GENERATOR 1B

START No.	DATE	SUCCESS	RUN TIME	UNPLANNED TRIP	DISCUSSION
120	03-21-90	No	0 min	No	Post-maintenance run, prime fuel lines.
121	03-21-90	No	0 min	No	Post-maintenance run, prime fuel lines.
122	03-21-90	No	15 min	No	Post-maintenance run, adjust governor.
123	03-21-90	No	2 min	No	Post-maintenance run, fuel oil delta pressure high.
124	03-21-90	No	4 min	No	Functional test run, fuel oil delta pressure high.
125	03-22-90	Yes	6 min	No	Functional test for maintenance.
126	03-22-90	Yes	1 min	No	Functional test for maintenance.
127	03-22-90	Yes	15 min	No	Post-maintenance overspeed test.
128	03-22-90	Yes	3 min	No	Post-maintenance overspeed test.
129	03-22-90	Yes	5 min	No	Post-maintenance overspeed test.
130	03-22-90	Yes	5 min	No	Voltage clamp circuit adjust.
131	03-22-90	Yes	2 min	No	Voltage clamp circuit adjust.
132	03-22-90	No	1 1/2 hr	Yes	Post-maintenance load test, high temperature lube oil trip.
133	03-23-90	Yes	7 hr	No	Post-maintenance load test
134	03-23-90	No	3 min	Yes	Post-maintenance load test, low pressure jacket water trip.
135	03-23-90	Yes	4 1/2 hr	No	Post-maintenance load test.
136	03-24-90	No*	33 min	No	Post-maintenance load test, high temperature jacket water alarm.
137	03-27-90	Yes	1 1/2 hr	No	Bubble test.
138	03-27-90	Yes	42 min	No	Trip simulation test.
139	03-27-90	Yes	3 min	No	Trip simulation test.
140	03-27-90	Yes	2 min	No	Trip simulation test.
141	03-27-90	Yes	6 min	No	Trip simulation test.
142	03-27-90	Yes	57 min	No	UV test.
143	03-28-90	Yes	1 3/4 hr	No	Normal surveillance
144	03-28-90	Yes	4 min	No	Low pressure lube oil modification functional test.
145	03-28-90	Yes	4 min	No	Low pressure lube oil modification functional test.
146	04-04-90	Yes	1 1/4 hr	No	Post-maintenance load test.
147	04-05-90	Yes	5 min	No	LOSP trip modification functional test.
148	04-05-90	Yes	2 hr	No	Normal surveillance.

* High temperature jacket water trip alarm was received and the engine kept running.

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