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UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II 101 MARIETT 4 STREET, N.W. ATLANTA, GEORGIA 30323

JAN 1 4 1992

Docket Nos. 50-424, 50-425 License Nos. NPF-68, NPF-81 EA 91-195

Georgia Power Company ATTN: Mr. W. G. Hairston, III Senior Vice President -Nuclear Operations P. O. Box 1295 Birmingham, AL 35201

Gentlemen:

SUBJECT: NOTICE OF VIOLATION (NRC INSPECTION REPORT NOS. 50-424/91-30 AND 50-425/91-30)

This refers to the special inspection conducted by the Nuclear Regulatory Commission (NRC) Augmented Inspection Team (AIT) at your Vogtle Electric Generating Plant (VEGP) during the period of October 29 - November 1, 1991. The AIT was chartered on October 28, 1991, and directed to review the loss of decay heat removal capability that occurred at your facility on October 26, 1991. The report documenting this inspection was sent to you by letter dated December 2, 1991.

The findings of the AIT indicate that operations personnel failed to exercise adequate control over the Unit 1 reactor cavity draindown evolution, which resulted in the interruption of decay heat removal for approximately 16 minutes and a resultant 20 degree Fahrenheit increase in core temperature. While the sudden increase in core temperature did not have significant consequences, the performance of the operations staff which allowed this condition to occur, particularly the control room operators, is cause for concern.

The AIT found that the off-going Unit Shift Supervisor was not aware of the commencement of the draindown. Additionally, the Auxiliary Plant Operator (APO) sent to monitor the reactor cavity-vessel level locally. did not use the tygon tubing level indicator as directed. Rather the APO use, the wrong level instrument (sight glass) which was valved out of service because it was a new modification that had not been tested and turned over to the station. About one hour after the start of the draindown, an oncoming Plant Equipment Operator (PEO), who relieved the APO, discovered that the sight glass was valved out and notified the control room. Apparently, the PEO did not recognize that the tygon tubing which was located about 8 feet away should have been the correct indication to be monitored. Though control room personnel halted the draindown until the sight glass was valved in, they not only failed to : ecognize the error but also failed to assure the sight glass system was walked down and operable as one isolation valve remained closed. Moreover the plant operations staff was not aware that the level instruments. in the control room were inaccurate because of a HEPA filter ventilation system connected to the Unit 1 pressurizer vent point.

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As the draindown continued, the control room operators noted indications that the B Residual Heat Removal (RHR) pump was cavitating. The B RHR pump was placed on miniflow and the A RHR pump was realigned from the draindown configuration to refill the reactor vessel. The draindown, which was intended to drain the water from the reactor cavity to a level of two feet below the vessel flange (192 foot level), progressed down to the mid-loop (186 feet level). In view of the lack of adequate level indication, it was fortuitous that a more significant situation did not occur.

Based on the results of the AIT inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). Consideration was given to categorizing the violations in the Notice at a higher severity level due to the performance problem and the inadequate design and installation procedures for reacfor water level indication which resulted in a common mode failure for all level instruments. Concerns with assuring adequate level indication and decay heat removal have been the subject of NRC generic communication with the industry. Should similar violations occur in the future, escalated enforcement action may be taken.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your reponse to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

The responses directed by this letter and the enclosed Notice .re not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Action of 1980, Pub., L. No. 96-511.

In accordance with 10 CFR 2.790(a), a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Should you have any questions concerning this letter, please contact us.

Sincerely, Luis A. Reyes, Director

Luis A. Reyes, Director Division of Reactor Projects

Enclosure: Notice of Violation

cc w/encl: (see next page)

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3

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