

NOTICE OF VIOLATION

Georgia Power Company
Vogtle Unit 1

Docket No. 50-424
License No. NPF-68

During the NRC inspection conducted on October 29 - November 1, 1991, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1991), the violations are listed below:

- A. Technical Specification 6.7.1.a requires written procedures be established, implemented, and maintained covering activities referenced in Regulatory Guide 1.33, Appendix A, Revision 2, February 1978. Activities referenced include general plant operating procedures for refueling. Implicit in this TS is the requirement that the procedures contain adequate guidance to ensure those activities are conducted properly.

Contrary to the above, on October 26, 1991, procedures used for reducing reactor water level provided no instructions directing Operations to verify that a correct reactor water level indication lineup existed, and provided no instructions to ensure an adequate vent path was established.

This is a Severity Level IV violation (Supplement 1).

- B. 10 CFR 50, Appendix B, Criterion II, Design Control, requires that design control measures shall provide for verifying the adequacy of design, such as by performance of design reviews. In addition, design changes, including field changes, shall be subject to design control measures commensurate with those applied to the original design. Measures shall also be established for the identification and control of design interfaces and for coordination among participating design organizations.

Contrary to the above,

1. The licensee failed to verify the adequacy of the design for the reactor water level indicating system. The connection of a High Efficiency Particulate Absorber (HEPA) filter to the Unit 1 pressurizer vent point affected the visual and electronic water level instruments in a nonconservative manner during the October 26, 1991, reactor water level draindown. An analysis for connecting the HEPA filter to this safety related system was not performed. Thus, the effect of this design change was not adequately reviewed.

2. The licensee failed to establish control and coordination among participating design organizations for the Unit 1 reactor water level indicating sightglass. The sightglass modification had not been adjusted and functionally tested by the Maintenance department. Thus, the Control Room had not been notified in writing that the modification was complete and ready for use. During the October 26, 1991 event in which reactor water level was reduced, the Operations department used the reactor water level indicating sightglass as one method of water level indication.

This is a Severity Level IV violation (Supplement 1).

- C. 10 CFR 50.72(b)(2)(iii)(B) requires the licensee to notify the NRC within four hours of the occurrence of an event that could have prevented the fulfillment of the safety function of systems needed to remove residual heat.

Contrary to the above, on October 26, 1991, the licensee failed to notify the NRC within four hours when the "B" RHR pump was removed from service due to a cavitation problem. Had the "A" RHR pump been placed in operation under existing conditions, it would have experienced a similar cavitation problem. Thus, the RHR system could not have performed its safety function.

This is a Severity Level IV violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Georgia Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D. C. 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, Vogtle Electric Generating Plant, within 30 days of the date of the letter transmitting this Notice of Violation. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Atlanta, Georgia
this 14 day of Jan. 1992