



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

FEB 03 1992

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Georgia Power Company  
ATTN: Mr. W. G. Hairston, III  
Senior Vice President -  
Post Office Box 1295  
Birmingham, Alabama 35201


Gentlemen:

SUBJECT: TRANSCRIPT OF VOGTLE ENFORCEMENT CONFERENCE

As a result of a copying error, the transcript of the September 19, 1991 Vogtle Enforcement Conference enclosed with my January 6, 1992 letter was incomplete. Please insert the enclosed missing pages in your copy. I apologize for the inconvenience.

A copy of this letter and its enclosure will be placed in the NRC Public Document Room.

Sincerely,

  
George R. Jenkins, Director  
Enforcement and Investigation  
Coordination Staff

Enclosure:  
Missing pages from  
the Vogtle transcript

cc w/encl:  
Public Document Room DCD  
State of Georgia

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1 the operations manager specifically addressed tech  
2 spec 3.4.1.4 loops filled condition.

3 Second, early in 1989, shift briefings  
4 and operations reading books contained entries  
5 addressing the RMWST valves and their required  
6 positions during mode 5B and 6. Also, other  
7 procedures including -- I'm sorry, that was out of  
8 order. Also, other procedures including the Vogtle  
9 12,006-C were revised to add precautions regarding  
10 RMWST valve operations.

11 Guidance available to operators  
12 concerning water levels and reduced inventories of  
13 the RCS has also significantly evolved since the  
14 October 1998 -- or 1988 time frame. Plant data  
15 books have been revised several times to add  
16 pictorials and details concerning RCS water level  
17 information for the operators. Training is now  
18 provided specifically concerning the loops not  
19 filled condition.

20 In March, on March 30th, 1990, further  
21 clarification was provided to the operations  
22 department based on additional analysis from  
23 Westinghouse regarding the inventory assumed and  
24 regarding loops not filled. This has now also been  
25 included in the training program and in the

1 procedures. During re-qualification training,  
2 operators receive specific training on revised  
3 procedure 12,006-C regarding the opening of the  
4 RMWST discharge valves and tech spec interpretations  
5 of loops not filled.

6           Regarding voluntary entry in the tech  
7 specs, on October 2nd, 1989, a corporate policy from  
8 myself providing overall guidance on this issue was  
9 issued. Specifically, it stated in part, voluntary  
10 entry into an LCO which expressly prohibits a given  
11 condition and requires immediate corrective action  
12 should not be made.

13           On August 15th, 1991, after we became  
14 aware of recent internal NRC positions, a memorandum  
15 from the Vogtle general plant manager advised  
16 operators that the NRC does not endorse voluntary  
17 entry in the LCOs which do not have a specific  
18 allowed outage time. Specifically his memo stated,  
19 Georgia Power Company has recently become aware of  
20 an NRC position that tech spec LCOs and their  
21 associated action statements which do not provide a  
22 specific LCO action time, often referred to by the  
23 NRC as an allowed outage time or AOT, should not be  
24 voluntarily entered except as expressly provided in  
25 the associated surveillance requirements.

1           The purpose of our plant is to generate  
2 electricity, but in doing so we feel that our number  
3 one thought at all times has to be on the safety of  
4 the plant and, secondly, on regulatory compliance.  
5 Regulatory compliance assists us in many cases in  
6 operating the plant safely, but regardless it is an  
7 obligation that we accept when we accept the license  
8 to operate the plant. And I have communicated that  
9 clearly many times, I think it is essential and that  
10 is a fundamental message that every one of my  
11 operators I think will repeat back to you, at any  
12 time. That's how strongly I feel about it.

13           MR. SNIEZEK: That's whether or not  
14 something is covered by the tech specs, even if the  
15 issue isn't addressed in the tech specs or if it's  
16 wrong in the tech specs, safety comes first, is that  
17 the message?

18           MR. McCOY: Yes, that's the message.

19           MR. SNIEZEK: Those are all the questions  
20 I have on the presentation. Ask any follow-up.

21           MR. EBNETER: I don't have any.

22           MR. PARTLOW: None other.

23           MR. LIEBERMAN: I have some on the fourth  
24 slide, the one with the action of the night shift on  
25 October 11th and 12th.

1 MR. McCOY: Okay, I have it.

2 MR. LIEBERMAN: The second bullet  
3 involving training guidance, do you accept  
4 responsibility that the company should provide that  
5 training guidance?

6 MR. McCOY: Yes, I do. I also feel that  
7 there is an obligation on the part of the regulator  
8 to make guidance clear when there is evidence that  
9 it is not clear, but I accept fully my  
10 responsibility to making clear regardless.

11 MR. LIEBERMAN: Okay, on the next slide,  
12 actions of the day shift of October 12th, 13th. The  
13 next to the last bullet, is talking about the  
14 operation manager was not motivated by schedule or  
15 economic benefits, I believe you made a comment that  
16 the delay in chemical addition did have some cost to  
17 the company?

18 MR. McCOY: Yes.

19 MR. LIEBERMAN: Could you give me some  
20 estimate as to the type cost it was?

21 MR. McCOY: Well, what I had in mind by  
22 that is when he placed the evolution on hold, that  
23 evolution is on critical path, that is, it affected  
24 the overall outage time. The outage of a nuclear  
25 unit in our system costs the customers and the

1 company approximately a quarter of a million dollars  
2 per day and --

3 MR. REPKA: He's got the figures right  
4 there for you.

5 MR. McCOY: This is submitted in our --  
6 you want to quote the exact place?

7 MR. REPKA: This is Attachment 3 to  
8 Appendix 2 of the company's response to demand for  
9 information.

10 MR. PARTLOW: Ask a related question, I  
11 realize that you answered our question about costs  
12 and schedule by saying, clearly we took the penalty  
13 by doing the chemical addition and, therefore, there  
14 were no costs or schedule implications.

15 Let me ask it another way, suppose it  
16 were given that you were going to carry out chemical  
17 cleaning, and taking the given at that time, you  
18 said, by golly, we can't do it now the way we were  
19 going to do it, we need another way, would that  
20 delay, informally, speculative, would that delay  
21 have been hours, days, or weeks to the outage?

22 MR. McCOY: Jim, I can't give you a  
23 definite answer to that. I think there would have  
24 been several alternatives and I think there may have  
25 been different times depending on different

1 you watch these evolutions in the simulator that put  
2 people under more pressure, and so forth, and I  
3 routinely go there and watch the crews.

4 We have changed a number of things since  
5 '88 in the way that these evolutions are handled and  
6 the way our people perform. I again, I was quite  
7 proud during this recent inflow evaluation that our  
8 crews performed in the simulator under observation  
9 under emergency procedures with no comments, no  
10 adverse comments. I am quite proud of that, I think  
11 that is one of the essential elements of safety in a  
12 plant is that the operating crews can handle adverse  
13 evolutions well.

14 Pat thinks that I might ought to point  
15 out, because everybody here is not as familiar as we  
16 are with this hydrogen addition evolution, this is  
17 not a big thing. What it involves is hooking up a  
18 gas bottle to a vent valve and opening the valve.  
19 And it's not a big complex evolution. The  
20 importance of it is its effect on this loop filled  
21 issue.

22 MR. AJLUNI: Hydrogen, you meant  
23 nitrogen?

24 MR. McCOY: What did I say?

25 MR. AJLUNI: You said hydrogen.

1 outage, this briefing would have been the first  
2 instance that I knew about my specific  
3 responsibilities.

4 That's the thing I read before and I  
5 won't go on through that. But clearly he was aware  
6 from that of the draining evolution. Now, what he  
7 doesn't address to my recollection is that during  
8 his shift -- well, let's see. That during his shift  
9 that they continued draining the RCS and that they  
10 did the nitrogen addition. He doesn't say anything  
11 in his submittal about whether he did or didn't know  
12 that. He said -- he speculates that because his log  
13 didn't have -- he's trying to say why his log didn't  
14 have an entry on the nitrogen.

15 MR. SNIEZEK: I'm not an expert, maybe  
16 I'm wrong, the nitrogen addition is simultaneous  
17 with drain down?

18 MR. McCOY: That's correct. There are  
19 two evolutions going on together.

20 MR. SNIEZEK: In your Exhibit 14 --

21 MR. McCOY: No.

22 MR. AJLUNI: That's not accurate. They  
23 injected the nitrogen and then they started the  
24 drain down, the two evolutions were not  
25 simultaneous.