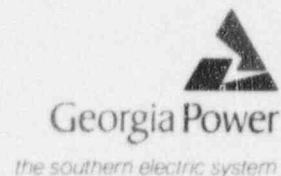


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C. K. McCoy  
Vice President, Nuclear  
Vogtle Project



October 9, 1995

LCV-0669-A

Docket No. 50-424  
50-425

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

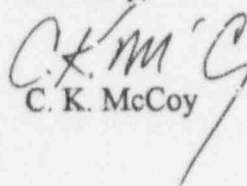
Ladies and Gentlemen:

**VOGTLE ELECTRIC GENERATING PLANT  
REPLY TO A NOTICE OF VIOLATION**

Pursuant to 10 CFR 2.201, Georgia Power Company submits the enclosed information in response to a violation identified in Inspection Reports 50-424;425/95-18 which concerns the inspection conducted by the Vogtle Electric Generating Plant (VEGP) NRC Resident Inspectors from July 16, through August 19, 1995.

Should you have any questions feel free to contact this office.

Sincerely,

  
C. K. McCoy

CKM/AFS

Enclosure: Reply to NOV 50-425/95-18-01

cc: Georgia Power Company  
Mr. J. B. Beasley, Jr.  
Mr. M. Sheibani  
NORMS

U. S. Nuclear Regulatory Commission  
Mr. S. D. Ebnetter, Regional Administrator  
Mr. L. L. Wheeler, Licensing Project Manager, NRR  
Mr. C. L. Ogle, Senior Resident Inspector, Vogtle

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## ENCLOSURE

### VOGTLE ELECTRIC GENERATING PLANT - UNIT 2 REPLY TO A NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424;425/95-18

The following is a transcription of the violation as cited in the Notice of Violation (NOV):

"During the NRC inspection conducted on July 16 through August 19, 1995, a violation of NRC requirements was identified. In accordance with the 'General Statement of Policy and Procedures for NRC Enforcement Actions,' (Enforcement Policy) (60 FR 34381, dated June 30, 1995), the violation is listed below.

Technical Specification 6.7.1a requires that written procedures be established, implemented, and maintained covering activities delineated in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Rev. 2, February 1978, delineates the types of safety-related activities that should be covered by written procedures for startup, operation, shutdown, and performing maintenance.

Vogtle procedure 13145, Diesel Generators, section 4.4.1, Cylinder Moisture Check, provides instructions on how to perform cylinder moisture checks and states that two operators will perform the moisture checks prior to commencement of diesel generator surveillance tests. The procedure requires one operator to bar the engine while one operator monitors the cylinder petcocks for moisture.

Contrary to the above, on August 3, 1995, procedures were not implemented in that one operator, versus the two required by procedure, was observed performing the required moisture checks on diesel generator 2A prior to the monthly surveillance test. The operator was unable to monitor the cylinder petcocks and bar the engine simultaneously.

This is a Severity Level IV violation (Supplement I) (Unit 2 only)."

#### RESPONSE TO VIOLATION (50-425/95-18-01)

##### Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

##### Reason for the Violation:

The cause of the violation was the result of cognitive personnel error in that the operator failed to follow procedure 13145-2. However, there were several contributing causes identified for the operator's actions.

## ENCLOSURE

### VOGTLE ELECTRIC GENERATING PLANT - UNIT 2 REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424;425/95-18

The 2A Diesel Generator had been previously placed in the maintenance mode for replacement of the voltage regulator potentiometers. After completion of the maintenance activity the operator from the non-shift related surveillance team was notified and performed the moisture checks without the assistance of another operator. The root cause of this event was that the operator was not familiar with the requirement in the procedure to have two operators present during the performance of the moisture checks. Other contributing causes were the incomplete briefing by the USS, the failure of the USS to ensure that two operators were assigned to perform the moisture checks and the fact that the operator entered the procedure at a step after the location of the note stating that two operators were required to perform the moisture checks.

Also, the checklist in procedure 13145-2 does not require two operator's signatures to document the successful completion of the moisture check in accordance with the procedure's intent.

#### Corrective Steps Which Have Been Taken and the Results Achieved:

Corrective actions taken included counseling the involved operator on the necessity of familiarity and compliance with applicable procedures and for using the **Stop Think Act Review** (STAR) technique of self-checking. Additionally, the USS was counseled on the need to verify that all requirements to accomplish an activity are in compliance, as well as the need to thoroughly brief personnel on the expectations and requirements of that activity.

#### Corrective Steps Which Will Be Taken to Avoid Further Violations:

1. This event will be presented in operator training as an example of the need to review procedures for routine activities and the importance of familiarity with the applicable procedural requirements. Corrective actions are expected to be completed by November 20, 1995.
2. The procedure checklist will be reviewed for improvements by November 15, 1995.

#### Date When Full Compliance Will Be Achieved:

Full compliance was achieved on September 7 and 8, 1995 when the operator and the USS were counseled concerning the importance of procedure compliance and the necessity to brief personnel on the requirements and expectations to successfully complete an activity.