### UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	) ) Docket Nos. 50-424-OLA-3
GEORGIA POWER COMPANY, et al.	) 50-425-OLA-3
(Vogtle Electric Generating Plant, Units 1 and 2)	) Re: License Amendment ) (Transfer to Southern Nuclear)

## AFFIDAVIT OF PIERCE H. SKINNER IN RESPONSE TO BOARD QUESTIONS ON SENSOR CALIBRATION PROCEDURES

I, Pierce H. Skinner, having first been duly sworn, hereby depose and state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission, Region II. I serve as a Branch Chief in the Division of Reactor Projects. My education and professional gualifications are set forth in Staff Exhibit II-43.

2. The purpose of this affidavit is to respond to questions that Chairman Bloch posed to the Staff during the September 1995 hearing sessions. The Chairman asked whether, after Georgia Power Company (GPC) identified a calibration problem with the high-temperature jacket water sensors subsequent to the March 1990 event, GPC pursued "adequate engineering analyses to determine that the new procedure for calibrating those sensors was adequate." Tr. 14966-14967. Judge Bloch also asked me to review what GPC knew about the calibration problem and the procedure that they accepted to determine whether GPC was adequately careful in accepting a new procedure for calibration. Tr. 14967.

3. The procedure in use prior to the March 1990 event was a generic one which contained minimal information and direction for performing the procedure. See GPC Exhibit II-154. This lack of information was recognized in 1988 by personnel using the procedure and a Request for Engineering Review (RER) was generated. GPC Exhibit II-168. In response to that request, GPC prepared a guidance document that was attached to a Maintenance Work Order (MWO) that was used to calibrate the sensors such that both the generic procedure and the RER attached to the MWO were required to be used. See Briney, Tr. 12302-12303. Although the guidance in the RER response was developed with input from the Calcon vendor representative, in my opinion, the information should have, at that time, been recognized as still being minimally acceptable and a detailed procedure should have been written.

4. A review of data contained in Appendix I to NUREG-1410, indicates that although many Calcon devices required recalibration, a substantial amount of these occurred during the construction acceptance test program and prior to the licensing of Unit 1 (March 1987) and Unit 2 (March 1989). Although I am not familiar with the specifics of the Vogtle construction program, based on my past experience with nuclear plant construction, recalibration during this period would not be unusual since activities during final construction and testing could have resulted in more frequent calibrations of instruments. There is no indication, however, that the licensee trended post-licensing calibration problems that occurred prior to the March 1990 event.

5. Following the March 1990 event, GPC brought the Calcon vendor representative to Vogtle to assist site technical personnel in analyzing the performance

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of the Calcon sensors. GPC Exhibit II-167 (NUREG-1410, Appendix J) at J-22. In addition, GPC hired Wyle Laboratories to perform independent testing of the sensors. GPC Exhibit II-63 (Ward Exhibit E) at 3. After this testing, a specific Calcon temperature sensor procedure (Procedure 22981-C) was developed on May 15, 1990. When this procedure was used for the first time, a diesel generator tripped because the procedure, as written, contributed to the improper calibration of the sensors. Wyle Laboratories was again asked to assess these sensors. See GPC Exhibit II-63 (Ward Exhibit E) at 4. Wyle identified the deficiencies in the procedure which had resulted in the erroneous calibrations. The procedure was revised to correct these deficiencies on June 8, 1990 and subsequent calibrations have been acceptable. This procedure was provided to the Transamerica Delaval Owner's Group and distributed to all other utilities that have Transamerica Delaval diesel generators. See GPC Exhibit II-93 (Ward Exhibit G) at 7.

6. On the basis of the above information, it is my opinion that GPC's actions in working with the Calcon vendor and employing Wyle Laboratories constituted a reasonable engineering approach to determine adequacy of the procedures for calibration of the Calcon sensors subsequent to the March 1990 event. GPC's initial actions, however, were inadequate to correct the problem.

The foregoing is true and accurate to the best of my knowledge and belief.

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Pierce H. Skinner

Subscribed and sworn to before me this day of October 1995.

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Notary Public My commission expires: \_\_\_\_

Notary Public, Clayton County, Georgia My Commission Excites Oct. 25, 1995

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) 50-425-OLA-3
) Re: License Amendment ) (Transfer to Southern Nuclear)

#### CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF MOTION FOR RECEIPT OF AFFIDAVIT OF PIERCE SKINNER IN RESPONSE TO BOARD QUESTIONS ON SENSOR CALIBRATION PROCEDURES" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class; or as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system; or as indicated by double asterisk, by facsimile this 19th day of October 1995.

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Adjudicatory File\* (2)
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U.S. Nuclear Regulatory Commission
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