



Georgia Power
the southern electric system

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Vice President and Project
General Manager
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July 10, 1984

10:16 A 8:55

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

File: X7BG10
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Reference: 50-424/84-10, 50-425/84-10

Attention: Mr. R. C. Lewis

The Georgia Power Company wishes to submit the following information concerning the violations discussed in your inspection report 50-424/84-10 and 50-425/84-10:

Violation 50-424, 425/84-10-01, "Training and Indoctrination of Electrical Contract QC Personnel" - Severity Level V.

- (1) Georgia Power Company acknowledges the discrepancies identified in the violation.
- (2) The reasons for the violation are as follows:
 - a. Electrical QC was inexperienced in dealing with contract QC inspectors. It was erroneously assumed that contract inspectors would have sufficient training and experience upon arrival at the Vogtle Electric Generating Plant to take the qualification test after a shortened training course. No inspectors were allowed to perform any work prior to passing the qualification test. Due to a high failure rate, Georgia Power Company extended the training sessions for contract inspectors.
 - b. Prior to January, 1983 indoctrination of new personnel was the responsibility of the Training Section. This responsibility was then transferred to the Human Resources Section. The Human Resources Section failed to recognize the importance of new employee indoctrination and subsequently discontinued the indoctrination program.
- (3)&(4) The following actions have been taken to correct the discrepancies identified in the violation and to prevent their recurrence:
 - a. A formal training program for contract QC inspectors was developed and implemented in April, 1984. The program requires that contract inspectors receive supervised classroom training on job-specific requirements and thirty days of on-the-job training prior to being certified for Vogtle work.

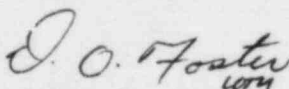
- b. Field procedure QC-A-02 has been developed and issued to provide controls for the indoctrination of new inspection personnel. The procedure provides a subject outline for conducting indoctrinations and establishes indoctrination as a prerequisite to certification.
- (5) All corrective actions were completed and full compliance to applicable regulatory requirements was achieved on June 14, 1984.

Violation 50-424, 425/84-10-02, "Changing of Procedure Requirements by Memorandum" - Severity Level V.

- (1) Georgia Power Company acknowledges the discrepancy identified in the violation.
- (2) Provisions in the Preface to the Vogtle Electric Generating Plant Field Procedures Manual were intended to allow managers to revise or take exception to procedure requirements for specific situations within their area of responsibility provided the intent of the procedure requirement was not changed. This authority was exercised and documented in memorandums, which were limited in number and were distributed to all individuals in the procedure review/approval/signature cycle.
- (3) Field Procedure GD-T-01 has been revised to incorporate the changes made by the memorandum cited in the violation.
- (4) Based on Region II's position in Inspection Report 50-424, 425/84-10, Georgia Power Company will stop the practice of making procedure changes by memorandum. The General Manager of Vogtle Nuclear Construction will direct to all department managers that, in the future, field procedure changes will be made only by revision or by the issuance of a Field Procedure Change Notice.
- (5) Corrective actions will be completed and full compliance with applicable regulatory requirements will be achieved by July 12, 1984.

This response contains no proprietary information and may be placed in the NRC Public Document Room upon receipt.

Yours truly,


D. O. Foster

REF/DOF/tdm

(See Page Three for Distribution)

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