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Georgia Power

the southern electric system

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16 A 8: 54

July 3, 1984

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

File: Y7BG10

Log: GN-382

Reference: 50-424/84-09, 50-425/84-09

Attention: Mr. R. C. Lewis

Gentlemen:

Georgia Power Company presented its response to the violation discussed in your inspection report 50-424/84-09 and 50-425/84-09 in a letter from D. O. Foster to R. C. Lewis, dated June 11, 1984. Based on additional discussion within Georgia Power Company and additional conversation with the NRC, Georgia Power Company wishes to submit the following revised response.

Violation 50-424, 425/84-09-01, "Failure to Document Surveillance Inspections on the Fire Water Protection System" - Severity Level V.

- (1) Georgia Power Company acknowledges that mechanical equipment installation surveillances for fire protection systems were not documented in accordance with Procedure QC-T-11, Revision 1, when Unresolved Item 83-20-01 was identified during NRC Inspection 50-424, 425/83-20 (October 25-28, 1983). Revision 2 of Procedure QC-T-11, which clarified the intended purposes of the mechanical surveillance program and the documentation requirements for these surveillances, was issued on January 18, 1984, to resolve the concerns of Unresolved Item 83-20-01. Subsequent to these corrective actions, during NRC Inspection 50-424, 425/84-09 (April 17-20, 1984), Unresolved Item 83-20-01 was upgraded to a Violation.
- (2) The mechanical surveillance procedure was developed to allow the inspection supervisor to define specific criteria for surveillances and have the inspector report back a prescribed format (exhibit 01 to procedure QC-T-11). On area type

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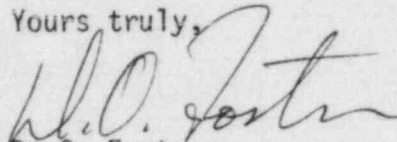
surveillances where no specific criteria had been selected by the inspection supervisor, it was intended that the surveillance be documented in field books for reference. This intended exception to use of the form was not included in QC-T-11. The fire protection surveillance was an area type surveillance and was not documented using the required form. The procedure was revised on January 18, 1984 to clarify this intent.

- (3)&(4) Revision 1 of Procedure QC-T-11 was revised and reissued on January 18, 1984. The following clarifications regarding the intended purpose and use of the mechanical surveillance program were made:
- a. The mechanical surveillance program applies to all contractor QA/QC programs to the extent considered necessary by Georgia Power Company QC management.
  - b. Results of surveillances may be documented by the inspector in a personal field book or other appropriate method. Surveillance documentation is retained as considered necessary by Georgia Power Company QC Management and is not considered permanent quality assurance records.
  - c. Discrepancies or deviations noted during surveillances are documented and dispositioned in accordance with Procedure GD-T-01, "Nonconformance Control," which provides for permanent quality assurance records for the identification, evaluation and resolution of nonconforming items.
  - d. Revision 2 also added requirements for sample verification of work completed by the contractor and accepted by the contractor's QC.
  - e. In addition, based on further GPC management discussion, Revision 2 to the procedure will be revised to apply additional controls to the mechanical surveillance procedure, QC-T-11. The revision will require the results of surveillances and verifications to be documented by the inspector and retained by GPC and will include a suitable form for documenting surveillances. The revision will specify the required review and distribution of surveillance results.
- (5) Full compliance will be achieved by August 1, 1984.

Mr. R. C. Lewis  
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This response contains no proprietary information and may be placed  
in the NRC Public Document Room.

Yours truly,



D. O. Foster

CWH/DOF/tdm

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