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Georgia Power

the southern electric system

C. K. McCoy
Vice President, Nuclear
Vogtle Project

February 7, 1996

LCV-0740-A

Docket No. 50-424
50-425

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

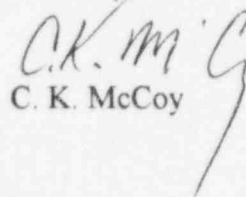
Ladies and Gentlemen:

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

Pursuant to 10 CFR 2.201, Georgia Power Company submits the enclosed information for Vogtle Electric Generating Plant (VEGP) in response to violations identified in Nuclear Regulatory Commission Inspection Reports 50-424,425/95-28, which documents the inspection conducted from November 19, 1995, through December 16, 1995.

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

Sincerely,


C. K. McCoy

CKM/AFS

Enclosure: Reply to NOV 50-424,425/ 95-28

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

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebner, 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 - UNITS 1 & 2 REPLY TO A NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424; 425/95-28

VIOLATION A, 50-424;425/95-28-01

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

“During the NRC inspection conducted on November 19 through December 16, 1995, violations of NRC requirements were identified. In accordance with the ‘General Statement of Policy and Procedure for NRC Enforcement Actions,’ NUREG-1600, the violation is listed below.

- A. 10 CFR 50, Appendix B, Criterion VIII, Identification and Control of Materials, Parts, and Components, requires that the traceability of materials installed in safety related components be maintained.

Vogtle Electric Generating Plant Operations Quality Assurance Manual, Section 8.2, Identification and Control of Materials, Parts, and Components; Specific Requirements, requires that measures be established to assure that these materials can be traced to associated documentation such as drawings, specifications, purchase orders, deviation reports, or physical and chemical mill tests.

To accomplish this, Procedure 00262-C, Control of Chemicals/Fluids, requires that portable/secondary oil containers be annotated with an issue authorization number or material/equipment request number when oil is transferred from the original container.

Contrary to the above, on November 29, 1995, the licensee failed to transfer the issue authorization or material/equipment request number to secondary oil containers in the predictive oil laboratory. This oil is added to safety related equipment to replenish oil removed by sampling.

This is a Severity Level IV violation (Supplement I).”

RESPONSE TO VIOLATION A (50-424; 425/95-28-01)

Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

Reason for the Violation:

This violation was a result of personnel error. On November 28, 1995, maintenance personnel collected an oil sample from the Unit 2 Turbine Driven Auxiliary Feedwater (TDAFW) Pump for routine oil sampling. While performing this activity, the material traceability of the replacement oil became suspect. The oil container used for this application had the correct manufacturer's brand name applied, however the “Approved-Use Category Label” on the container was incorrect. Maintenance personnel typically transfer oil from large containers, with the proper

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“Approved-Use Category Labels”, to smaller containers for ease of handling. The correct “Approved-Use Category Labels” were not normally transferred to smaller containers. Contributing to this violation, the applicable maintenance department procedure did not provide specific guidance for transferring “Approved-Use Category Labels” on secondary containers. As a result of this labeling non-compliance, no instances were identified of improper oil usage in plant equipment.

Corrective Steps Which Have Been Taken and the Results Achieved:

1. The maintenance personnel involved have been counseled on the correct method of controlling materials.
2. Lubricant containers at the predictive oil laboratory which were not properly labeled or with suspect oil were discarded.
3. The applicable maintenance department procedure has been revised to provide clear guidance for ensuring lubricant containers are properly identified and that material traceability is maintained.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

Maintenance supervision will hold discussions with maintenance personnel to stress the importance of procedural compliance to ensure lubricant containers are properly labeled and material traceability is maintained. Estimated completion is February 16, 1996.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on December 12, 1995, when the lubricant containers were either properly labeled or discarded due to improper labeling.

VIOLATION B, 50-424;425/95-28-03

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

“During the NRC inspection conducted on November 19 through December 16, 1995, violations of NRC requirements were identified. In accordance with the ‘General Statement of Policy and Procedure for NRC Enforcement Actions,’ NUREG-1600, the violation is listed below.

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- B. License Condition 2 (E) to License Number NPF-68 issued March 16, 1987, and License Number NPF-81 issued March 31, 1989, requires the licensee fully implement all provisions of the NRC approved 'Alvin W. Vogtle Nuclear Plant Physical Security Plan.'

Paragraph 5.4.2.4 of the Physical Security Plan requires that designated vehicles inside the protected area not attended by an individual with unescorted access or a security officer as appropriate be secured to prevent movement. Possession of the keys by the authorized individual or security officer or physical restraint of the vehicle accomplishes this objective.

Procedure 00653-C, Protected Area Entry/Exit Control, Step 4.4.8 states that when a designated vehicle is left unattended in the protected area, the keys shall be kept by an authorized individual.

Contrary to the above, on December 11, 1995, an unattended designated vehicle was identified inside the protected area, with the keys in the ignition and the engine running.

This is a Severity Level IV violation (Supplement III)."

RESPONSE TO VIOLATION B (50-424; 425/95-28-03)

Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

Reason for the Violation:

The violation was a result of personnel error. This violation occurred on December 11, 1995, when a plant equipment operator left the designated vehicle (DV) unattended in the Protected Area (PA), with the keys in the ignition and the engine running. The operator was cognizant of the procedural requirements to secure DVs.

Corrective Steps Which Have Been Taken and the Results Achieved:

1. The individual involved was counseled and reminded of procedural requirements concerning the use of vehicles within the PA.
2. The number of designated vehicles in the PA has been reduced.

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Corrective Steps Which Will Be Taken to Avoid Further Violations:

1. The Security Department will be conducting a series of awareness briefings with appropriate departments emphasizing the importance of securing designated vehicles within the PA. Estimated completion is scheduled for February 20, 1996.
2. A special task team of interdepartmental employees was established under the guidance of the Security Manager to evaluate DV problems and to recommend additional corrective actions to management. As a result of this evaluation, stricter administrative controls for DVs will be implemented by February 20, 1996.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on December 11, 1995, when the DV was secured by the security officer.