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the southern electric system

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34 AUG 17 AIO: 11

August 13, 1984

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

File: X7BG10  
Log: GN-405

Reference: 50-424/84-17, 50-425/84-17

Attention: Mr. R. C. Lewis

The Georgia Power Company wishes to submit the following information concerning the violations discussed in your inspection report 50-424/84-17 and 50-425/84-17:

**Violation 50-424, 425/84-17-01, "Failure to Adequately Control Welding" - Severity Level IV.**

- (1) Georgia Power Company acknowledges the discrepancies identified in the violation.
- (2) The discrepancies identified by the NRC inspector associated with Pullman/Kenith-Fortson (P/K-F) welding technique sheets are attributed to a failure to adequately control the preparation, distribution, and review of the sheets. As a result, technique sheets were not properly updated with the latest information.

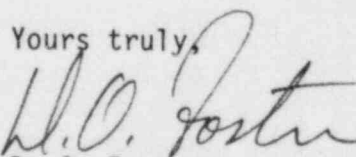
It is not practical to include all the requirements of AWS D1.1 in welding procedure specifications. Welders working on the Vogtle Project are generally familiar with the standard limitations on peening; therefore, it was not considered necessary to provide guidance for peening in procedural form.

- (3) The following actions have been taken to correct the discrepancies identified in the violation:
  - a. All P/K-F welding technique sheets have been reviewed and revised to accurately reflect the requirements of P/K-F welding procedures. Required shield gas flow rates were added to applicable technique sheets and erroneous welding current information was corrected.

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- b. On July 10, 1984, in the presence of NRC Region II Inspectors J. L. Coley and R. W. Newsome, three test welds were performed on thin guage (#18) sheet metal. One of the welds was performed using a welding current of 50 amps, which is lower than the current specified by WPS-300 of the erroneous technique sheet. The other test welds were performed using a higher shield gas flow rate (65 CFH) than noted in the violation. All three test welds yielded satisfactory results. Based on the results of this test, it is highly unlikely that the use of the outdated technique sheets has had an adverse affect on the quality of sheet metal welds.
  - c. Welding Procedure Specification 129 is to be used in conjunction with General Weld Standard GWS-ST-1. GWS-ST-1 is being revised to provide welders with guidance for peening as required in AWS D1.1, Paragraph 3.1.
- (4) To ensure that further violations do not occur, effective dates are now being applied to welding technique sheets to correspond with the effective dates on the Welding Procedure Specifications. When Welding Procedure Specifications are revised, the applicable technique sheets will be reviewed against the revised information, revised if necessary, and redistributed with a new effective date.
- (5) All corrective actions will be completed and full compliance with applicable regulatory requirements will be achieved by September 8, 1984.

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

Yours truly,  
  
D. O. Foster

REF/DOF/tdm

xc: U. S. Nuclear Regulatory Commission  
Attn: Victor J. Stello, Jr., Director  
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