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Georgia Power

the southern electric system

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ELV-03964
2142

Docket Nos. 50-424
50-425

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
REPLY TO AN EXERCISE WEAKNESS

As requested in NRC letter dated July 8, 1992, Georgia Power Company (GPC) submits the enclosed information in response to the exercise weakness identified in Inspection Report 50-424/92-10 and 50-425/92-10 which concerns the inspection conducted by Mr. F. Wright of the NRC during May 18 - 21, 1992. In the enclosure, transcription of the weakness precedes GPC's response.

Please contact this office if you have any questions.

Sincerely,

C.K.M.'s
C. K. McCoy

CKM/JJB/gmb

Enclosure: Exercise Weakness 50-424/92-10-01 and GPC Response

c(w): Georgia Power Company
Mr. W. B. Shipman
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U. S. Nuclear Regulatory Commission
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Mr. D. S. Hood, Licensing Project Manager, NRR
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ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 AND 2
NRC EXERCISE WEAKNESS 50-424/92-10-01 AND GPC RESPONSE

"Notification objective B.4 was to "Demonstrate the ability to expeditiously notify state, local and federal authorities." During the exercise review the inspector determined that the licensee failed to fully meet exercise objective B.4, in that, State and local notification's were not accurate or timely for several messages. Identified issues included the following:

- o Licensee notification message number 003 issued at 09:44 a.m. showed an Alert emergency classification when a SAE had been declared 9 minutes earlier at 09:35 a.m.
- o The licensee issued notification message number 004, issued at 09:51 a.m., was issued 16 minutes after declaring a SAE.
- o Notification messages 003 through 006, issued between 09:44 and 10:36 a.m., indicated that a release had started at 09:13 a.m., but contained no information concerning the magnitude of the release or projected offsite doses associated with the release.
- o Notification Message Number 006, issued at 10:36 a.m., did not document the release start time for the unmonitored release through the Steam Generator Safety Relief Valve (SGSRV). Notification Messages 006 indicated that a release, through the plant vent, had started at 09:12 a.m. A second release through the SGSRV had been identified 18 minutes earlier at 10:18 a.m. The following notification message, number 7, issued at 11:05 a.m. reported the start of the release, through the SGSRV, as 10:20 a.m., about 45 minutes after it had been identified.
- o Licensee notification message number 003 issued at 09:44 a.m. was issued 36 minutes after the previous notification. Notification message 002 was issued at 09:08 a.m. Licensee procedure 91002-C Emergency Notifications, Revision 21, step 4.3 requires followup notifications to be completed and transmitted to Federal, State, local authorities during an alert or higher classification when there is a significant change in plant conditions or at least every 30 minutes. The 30 minute notification limit was also exceeded by 1 minute for message number 002 and 2 minutes for message number 011.
- o Licensee procedure 91002-C, Emergency Notifications, Revision 21, required the Emergency Response Organization make initial and followup notifications to the NRC whenever the initial declaration of an emergency classification or upgrade of an emergency classification was made. The procedure required the completion of Checklist 3, Event Notification Worksheet for initial and followup notifications to the NRC. Updated forms were required whenever there was any further degradation in the plant conditions, there was any change in emergency

ENCLOSURE (CONTINUED)

NRC EXERCISE WEAKNESS 50-424/92-10-01 AND GPC RESPONSE

classification, or the emergency was terminated. The inspector determined that one Notification Worksheet was completed for the initial NRC notification of an Alert Classification at 08:26 a.m. However, no additional Event Notification Worksheets were completed for the Site Area Emergency or the General Emergency.

Licensee representatives reported that communications were continuously maintained with the NRC Duty Officer during the exercise and that the NRC was notified of changing conditions as they occurred. The licensee identified the failure to complete all of the required Event Notification Worksheets during their critique process.

The inspector determined that the licensee's failure to provide fully accurate and timely Notifications to Federal, State and local authorities in accordance with the federal regulations, the licensee's emergency plan, and implementing procedures was an Exercise Weakness.

Exercise Weakness 50-424/92-10-01: Licensee failed to make accurate and timely notifications to State and local agencies concerning emergency classification status, release conditions, and followup information."

Response to NRC Exercise Weakness 50-424/92-10-01:

During the graded exercise, GPC agrees that the above weakness existed and the following corrective actions have been or will be implemented:

Timeliness of Message 003 Declaring Alert and SAE:

- o During the post drill critique, the importance of completing notifications in a timely manner was discussed with responsible personnel. An example identified pertained to licensee notification message number 003 issued at 09:44 a.m. which showed an alert emergency classification when a site area emergency had been declared 9 minutes earlier at 09:35 a.m. This issue has been reviewed in briefings with appropriate personnel and in a lesson learned correspondence.

Timeliness of Message 003 and 004:

- o Lessons learned were issued discussing the timeliness of notifications to state, local and federal authorities; also, the importance of timeliness of notifications was discussed with appropriate personnel during the post drill critique.

ENCLOSURE (CONTINUED)

NRC EXERCISE WEAKNESS 50-424/92-10-01 AND GPC RESPONSE

Lack of Documenting Release Information and Magnitude:

- o Appropriate personnel have been briefed on the importance of the accuracy of radiological release information being transmitted to outside agencies.

Lack of Documenting Up-Grade Followup Notifications:

- o Lessons learned were issued concerning the importance of documenting up-graded notifications and appropriate personnel have been briefed.

In summary, immediate corrective actions that have been taken include briefing appropriate personnel and the issuance of a lesson learned correspondence on May 27, 1992, to all department managers discussing the lessons learned during the May 19, 1992, NRC Graded Exercise. Long term corrective action entails revising lesson plans by September 1, 1992 for future retraining.