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GPC EXHIBIT III-172  
BOCKHOLD EX. Q



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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
191 MARIETTA STREET, N.W.  
ATLANTA, GEORGIA 30333

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FROM REG. 2-ATLANTA

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

NUCLEAR REGULATORY COMMISSION  
EXHIBIT NO. II-172  
Docket No. 50-424/425-OLA-3  
In the matter of Georgia Power Co. et al., Vogtle Units 1 & 2  
 Staff  Applicant  Intervenor  Other  
 Identified  Received  Rejected  
Date 9/17/95 Witness George Bockhold

Docket Nos. 50-424, 50-425  
License Nos. NPF-68, NPF-81

Georgia Power Company  
ATTN: Mr. W.G. Hairston, III  
Senior Vice President -  
Nuclear Operations  
P. O. Box 1295  
Birmingham, AL 35201

Gentlemen:

SUBJECT: VOGTLE SPECIAL TEAM INSPECTION REPORT NOS. 50-424,425/90-19  
SUPPLEMENT 1

This refers to the inspection conducted by a Special Inspection Team on August 6 through 17, 1990. Previous correspondence associated with this inspection was transmitted to you on January 11, 1991. As discussed in the Inspection Summary of that document, the results of the allegation followup team would be the subject of separate correspondence. This report includes, in part, the results of that followup team. The inspection included a review of activities authorized for your Vogtle facility. At the conclusion of the inspection, these findings were discussed with those members of your staff identified in the enclosed inspection report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

The inspection teams' review of the allegations identified several additional weaknesses in operational polices and practices. These are identified in the inspection summary of the enclosed inspection report.

The inspection findings indicate that certain activities appeared to violate NRC requirements. The apparent violation associated with failure to provide accurate information to the NRC during the inspection is under consideration for escalated enforcement action. Accordingly, a Notice of Violation for this issue is not being issued at this time, and a response to this subject is not required. However, please be advised that the number and characterization of violations described in the enclosed Inspection Report associated with this subject may change as a result of further NRC review. You will be advised by separate correspondence of the results of our deliberations on this matter. We will contact you at a later date to arrange an enforcement conference to discuss this issue.

The additional violation described in this report, references to pertinent requirements, and elements to be included in your response are described in the Notice of Violation.

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PDR ADOCK 05000424  
G PDR

Georgia Power Company

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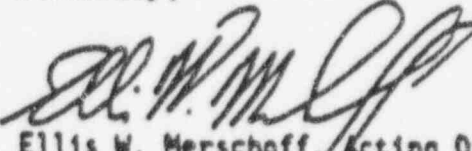
You are required to respond to this letter and Notice and should follow the instructions specified in the enclosed Notice when preparing your response to the violations. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790(a), a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Should you have any questions concerning this letter, please contact us.

Sincerely,



Ellis W. Merschoff, Acting Director  
Division of Reactor Projects

Enclosures:

1. Notice of Violation
2. NRC Inspection Report  
50-424,425/90-19,  
Supplement 1

cc w/encls:

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(cc w/encls cont'd - see page 3)

Georgia Power Company

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ENCLOSURE 2

Report Nos.: 50-424,425/90-19, Supplement 1

Licensee: Georgia Power Company  
 P.O. Box 1295  
 Birmingham, AL 35201

Docket Nos.: 50-424 and 50-425 License Nos.: NPF-68 and NPF-81

Facility Name: Vogtle Electric Generating Plant, Units 1 and 2

Inspection Conducted: August 6-17, 1990

Team Leader: Chris A. VanDenburgh, Section Chief,  
 Division of Reactor Inspections and  
 Safeguards, Office of Nuclear Reactor  
 Regulation

Team Members: Ron Aiello - Resident Inspector, Vogtle  
 Morris Branch - Senior Resident Inspector, Watts Barr  
 Robert E. Carroll, Jr. - Project Engineer, DRP, Region II  
 Larry Garner - Senior Resident Inspector, Robinson  
 Neal K. Hunemuller - Licensing Examiner, NRR  
 Larry L. Robinson - Investigator, OI, Region II  
 Robert D. Starkey - Resident Inspector, Vogtle  
 Craig T. Tate - Investigator, OI, Region II  
 Peter A. Taylor - Reactor Inspector, DRS, Region II  
 McKenzie Thomas - Reactor Inspector, DRS, Region II  
 John D. Wilcox, Jr. - Operations Engineer, NRR

Submitted by: Pierce H. Skinner  
 Pierce H. Skinner, Section Chief 3B  
 Region II, Division of Reactor Projects

Oct 7, 1991  
 Date Signed

Approved by: Alan R. Herdt  
 A. R. Herdt, Chief, Branch 3  
 Region II, Division of Reactor Projects

Oct 7, 1991  
 Date Signed

that GPC did not have a basis for their statements and misrepresented the air quality in the licensee's written response to the CAL, was not confirmed.

## 2.6 Reportability of Previous System Outages

An allegation indicated that VEGP failed to immediately notify the NRC as required by 10 CFR 50.72 when VEGP identified that both trains of the containment fan coolers (CFCs) had been previously inoperable at the same time on Unit 1.

### Discussion

The inspection team's review of plant records indicated that this condition occurred when EDG #1A was declared inoperable when tape (used when the EDG was being painted) was found on the EDG fuel rack. The tape kept the fuel injector piston from moving and injecting fuel into the EDG. With EDG #1A inoperable, the equipment associated with the Train A was also inoperable. In the process of investigating the installation of the tape, VEGP identified that this condition existed during a period when the Train B containment fan coolers were also in a degraded condition for maintenance.

During the performance of Surveillance Procedure 14623-1, Train B containment fan cooler (CFC) 1-1501-A7-003 failed to start in slow speed. LCO 1-90-560 was initiated at 1:15 a.m. on June 19, 1990, and maintenance on the CFC was initiated. The CFC was returned to operable status on June 19, 1990, at 2:15 p.m. Approximately 9 hours later [on June 19, 1990, at 11:59 p.m. (LCO 1-90-562)], EDG #1A was determined to be inoperable because the tape had been installed on the fuel rack. On July 17, 1990, VEGP issued LER 90-014 to identify the previously unrecognized violation of the LCO in accordance with 10 CFR 50.73.

### Conclusion

Based upon the fact that VEGP did not become aware that both trains of CFCs were simultaneously inoperable until after the Train B CFC fan had been returned to service, the immediate notification requirements of 10 CFR 50.72 were not applicable. The allegation that VEGP failed to immediately notify the NRC upon discovery of the previously degraded condition of the CFCs was not confirmed.

## 2.7 Intimidation of Plant Review Board Members

An allegation indicated that PRB members were allegedly intimidated and pressured by the general manager in a PRB meeting. The meeting occurred in February 1990, to determine the acceptability of the safety analysis for the installation of the FAVA microfiltration system.

### Discussion

As discussed in Section 2.1 of this inspection report, several safety evaluations were performed for the installation of a temporary modification which installed the FAVA microfiltration system. Discussions with PRB members indicated that during the review of these safety evaluations, various PRB members had expressed reservations on several occasions concerning the acceptability of the installation of the FAVA system.

Despite these reservations, the inspection team's review of the PRB Meeting minutes associated with this temporary modification identified few instances of the PRB members documenting their dissenting opinions. Specifically, PRB meeting 90-15 (dated February 8, 1990) documented one PRB member's negative vote and dissenting opinions regarding the acceptability of exempting the temporary modification from regulatory requirements and the adequacy of the system's safety evaluation. PRB Meeting 90-28 (dated March 1, 1990) indicated that information and issues regarding the FAVA system's safety analysis were presented to the PRB and that the general manager solicited written comments and questions from other members for resolution. The only other example was in PRB meeting 90-32 (dated March 6, 1990) which identified a dissenting opinion related to the acceptability of voting on the FAVA system installation when the PRB member who raised the initial questions and concerns on the operation of the FAVA system was not present.

Discussions with the PRB members indicated that during the various PRB meetings concerning the installation of the FAVA system, the PRB members felt intimidated and pressured by the presence of the general manager at the PRB meeting. The sworn testimony confirmed that on one occasion an alternate voting member felt intimidated and feared retribution or retaliation because the general manager was present at the meeting and the PRB member knew the general manager wanted to have the temporary modification approved. However, the testimony also indicated that the PRB member did not alter his vote and felt comfortable with how he had voted. In addition, the PRB member was not aware of any occasions on which he or any other PRB member had succumbed to intimidation or feared retribution.

The inspection team verified that the general manager was informed following this meeting that several PRB members viewed his presence as intimidating. As a result, on March 1, 1990, the general manager met with all PRB members to reiterate the member's duties and responsibilities. He specifically told the members that his presence at PRB meetings must not influence them and that alternates should be selected who would feel comfortable with this responsibility. He also addressed the difference between professional differences of opinion and safety or quality concerns, and their respective methods for resolution.

## Conclusion

The inspection team concluded that in one case a PRB voting member felt intimidated and feared retribution because the general manager was present at the PRB meeting. However, this member stated that he did not change his vote in response to this pressure and the general manager met with the PRB to allay fears. Based on the testimony, the inspection team concluded that retribution did not occur. Nevertheless, this confirmed event and the absence of dissenting opinions in the PRB meeting minutes indicate that there was a potential for an adverse effect on open discussions at the meeting. The licensee needs to ensure that PRB members freely and openly express their technical opinions and safety concerns.

## 2.8 Personnel Accountability

As a result of several comments and questions by the licensed operators to the inspection team, the team reviewed the method used to rate the performance of the shift superintendents (SS) and unit shift supervisors.

## Discussion

The operations manager stated that the SS reported directly to the operations manager and that he personally prepared their performance appraisals. The inspection identified that the SS reported to the Unit Superintendent (US), and that the US personally prepared the performance appraisals of the SS.

The personnel accountability system, first used in 1989, was a pay-for-performance methodology. Annual pay increases and a percentage of the Operations Department bonus were dependent on their ratings in accountability categories. Each accountability category was subdivided into performance categories. Most of the performance categories were based upon group performance. Once these are eliminated, any differential in pay will result from eight performance categories. Implementation of the plan in 1989 could result in up to an \$8,000-a-year difference in bonus pay to a SS. The performance categories and their relative weights are:

- Personnel safety	4.1%
- Regulatory compliance	10.2%
- ESFAS actuation	12.2%
- Reactor trips	10.2%
- MWD performance	4.1%
- Special projects	8.2%
- Personnel development	30.6%
- Training	20.4%

Therefore, 51 percent will be associated with personnel development and training and 32.6 percent will be associated with the number of LERs, and violations [i.e., regulatory compliance (10.2 percent), ESFAS actuation (12.2 percent) and reactor trips (10.2 percent)].