

February 27, 1996

Georgia Power Company  
ATTN: Mr. George Hairston  
President/CEO,  
Southern Nuclear Company  
Executive Vice President,  
Georgia Power Company  
P. O. Box 1295  
Birmingham, AL 35201

SUBJECT: PUBLIC MEETING ANNOUNCEMENT - MANAGEMENT MEETING FOR FARLEY,  
HATCH, AND VOGTLE

Gentlemen:

This refers to the meeting conducted by mutual request of Southern Nuclear Company (SNC), Georgia Power Company, and Region II, at the SNC, 40 Inverness Center Parkway, Birmingham, Alabama, Room 230 on February 20, 1996. The meeting's purpose was to discuss current SNC organization, engineering design and technical services, plant status and major problems at the Farley, Hatch, and Vogtle Plants. It also provided us the opportunity to discuss the current Notice of Enforcement Discretion Policy. Enclosed are a list of attendees and the presentation handouts.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10 Code of Federal Regulations, a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Should you have any questions concerning this meeting, please contact me at (404) 331-6299.

Sincerely,

Original signed by  
P. H. Skinner

Pierce H. Skinner, Chief  
Reactor Projects Branch 2  
Division of Reactor Projects

Docket Nos. 50-348, 50-364, 50-321  
50-366, 50-424, 50-425

License Nos. NPF-2, NPF-8, DPR-57,  
NPF-5, NPF-68, NPF-81

Enclosures:

1. List of Attendees
2. NRC Handouts
3. Agenda and GPC/SNC Handouts

cc w/encl: (See Page 2)

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9603120103 960227  
PDR ADOCK 05000321  
P PDR

IE45

cc w/encl:

J. T. Beckham, Jr.  
Vice President Plant Hatch  
Nuclear Operations  
P.O. Box 1295  
Birmingham, AL 35201

C. K. McCoy,  
Vice President  
Vogtle Electric Generating Plant  
P. O. Box 1295  
Birmingham, AL 35201

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General Manager, Plant Hatch  
Georgia Power Company  
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Services Manager, B-031  
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General Manager, Farley Plant  
Southern Nuclear Operating  
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Ashford, AL 36312

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D. N. Morey  
Vice President  
Farley Project  
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Chairman  
Houston County Commission  
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Dothan, AL 36302

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Manager Licensing - Hatch  
Georgia Power Company  
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Department of Natural Resources  
205 Butler Street, SE, Suite 1252  
Atlanta, GA 30334

Thomas Hill, Manager  
Radioactive Materials Program  
Department of Natural Resources  
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Chairman  
Appling County Commissioners  
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cc w/encl cont'd: (See Page 4)

cc w/encl: Continued  
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General Manager, Plant Vogtle  
Georgia Power Company  
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J. A. Bailey  
Manager-Licensing  
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Office of the County Commissioner  
Burke County Commission  
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Attorney General  
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Distribution w/encl:  
S. Ebnetter, RII  
P. Skinner, RII  
R. Wright, RII

Distribution cont'd: (See Page 5)



Distribution: (Continued)

A. Gibson, RII  
 C. Casto, RII  
 G. Hallstrom, RII  
 B. Siegel, NRR  
 K. Jabbour, I,RR  
 D. Wheeler, NRR

NRC Resident Inspector  
 U.S. Nuclear Regulatory Commission  
 7388 N State Hwy 95  
 Columbia, AL 36319

NRC Senior Resident Inspector  
 U.S. Nuclear Regulatory Commission  
 11030 Hatch Parkway North  
 Baxley, GA 31513

NRC Senior Resident Inspector  
 U.S. Nuclear Regulatory Commission  
 8805 River Road  
 Waynesboro, GA 30830

SEND TO PUBLIC DOCUMENT ROOM?		YES	NO				
OFFICE							
SIGNATURE	<i>R Wright</i>	<i>PH Skinner</i>					
NAME	RWright:dka	PHSkinner					
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COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

OFFICIAL RECORD COPY

DOCUMENT NAME: P:\MTS.SUM

## LIST OF ATTENDEES

### Nuclear Regulatory Commission Attendees:

S. Ebnetter, Regional Administrator, Region II (RII)  
A. Gibson, Director, Division of Reactor Safety (DRS), RII  
J. Johnson, Deputy Director, Division of Reactor Projects (DRP), RII  
P. Skinner, Chief, Branch 2, DRP, RII  
C. Casto, Chief, Engineering Branch, DRS, RII  
R. Wright, Project Engineer, Branch 2, DRP, RII  
B. Holbrook, Hatch Senior Resident Inspector, Branch 2, DRP, RII  
C. Ogle, Vogtle Senior Resident Inspector, Branch 2, DRP, RII  
T. Ross, Farley Senior Resident Inspector, Branch 2, DRP, RII  
H. Berkow, Director, Project Directorate II-2 (PDII-2), Office of Nuclear  
Reactor Regulation (NRR)  
D. Wheeler, Vogtle Project Manager, PDII-2, NRR  
K. Jabbour, Hatch Project Manager, PDII-2, NRR  
B. Siegel, Farley Project Manager, PDII-2, NRR

### Southern Nuclear Operating Company (SNC) Attendees:

G. Hairston, President & Chief Executive Officer  
J. Woodard, Executive Vice President - Nuclear  
J. Miller, Executive Vice President & Corporate Counsel  
L. Long, Technical Services Vice President  
K. McCoy, Vice President Vogtle Project  
D. Morey, Vice President Farley Project  
T. Beckham, Vice President Hatch Project

**EXAMPLES OF APPLICATION  
OF NOED CRITERIA**

Example : Browns Ferry Unit 2, R-II issued Jan. 25, 1995

Background      Plant in normal operation. One diesel generator declared inoperable due to failed turbocharger. Remaining diesels and two offsite power sources available. All ECCS systems operable. Required to restore operability of the failed diesel within 7 days or go to cold shutdown.

NOED request      Permit continued reactor operation for an additional 72 hours to complete repair.

Evaluation      Forced compliance with the license requirement would necessitate shutdown and involve unnecessary transient. Staff determination involved minimal or no safety impact.

Example :            TVA, Sequoyah Unit 2, RII-issued NOED on 11/9/94

Background            Plant in Mode 3. Steam-driven AFW inoperable. Required to restore operability within 72 hours or go to hot shutdown.

NOED request           Permit to stay in Mode 3 for an additional 72 hours to complete troubleshooting and repair

Licensee rationale        Need adequate steam conditions (Mode 3) for performing the test. Low decay heat, adequate SG inventory and motor-driven AFW pump available. No safety risk.

Evaluation            1)    The NOED is justified. Startup criterion 3 is satisfied. Forced compliance with the license requirement would necessitate shutdown which does not provide an overall safety benefit. Conversely, staying in the mode would demonstrate operability of the AFW which provides safety benefit.

Example : Indian Point 3, R-I issued May 11, 1995

Background Plant in hot shutdown. Leak in miniflow line which would render RHR system inoperable during repair. TS requires cold shutdown within 21 hours.

NOED request Need additional 48 hours in the existing hot shutdown condition to complete repair.

Evaluation Startup criterion 3 is satisfied.

In cold shutdown, the RHR system is used for decay heat removal and both RHRs are required to be operable. The miniflow line is required to support RHR operation.

- a) During repair of the miniflow line, the associated RHR pump would be running without miniflow protection and may result in loss of one RHR.
- b) Repairing the miniflow would require a freeze seal for isolation from the reactor coolant system. Loss of the freeze seal could lead to an unisolable RCS leak outside containment.
- c) Forced compliance with the license requirement not only provides no safety benefit but also would be detrimental to safety.

**SUMMARY OF NOVEMBER 1995 CHANGES/CLARIFICATIONS TO NOED  
IMPLEMENTATION GUIDANCE**

- An NOED is staff exercise of discretion to not take enforcement action for short-term non-compliance with license (but appropriate enforcement action taken for the root cause)
- Part of Enforcement Policy NUREG-1600 (previously 10CFR Part 2 Appendix C)
- NRC Inspection Manual Part 9900 Guidance revision issued 11/2/95; replaces 1/5/95 version
- Administrative Letter 95-05 issued 11/7/95
- New guidance more restrictive, but no change to policy or criteria
- NOED may not be justified if licensee created need by:
  - .. poor planning
  - .. failure to take timely action
  - .. failure to adopt available TS improvements
  - .. repeated requests without corrective action
  - .. staff must verify validity of need using criteria similar to 50.91
  - .. in near-term such cases must be elevated to ADP before NOED can be issued
- Staff must determine that action is clearly warranted from radiological health and safety standpoint
- Where possible, emergency situations should be addressed by emergency license amendments rather than NOEDs



- **NOED not appropriate for severe weather or other natural conditions which create need for overall public benefit/health and safety vs. radiological health and safety (may qualify for discretion per Section III of Policy, see Inspection Manual Part 9900 Attachment A for details)**
- **Cannot involve unreviewed safety question or significant hazards consideration**
- **Not appropriate for non-power or permanently shutdown reactors**
- **Only appropriate for non-compliance with license, not regulations or codes**
- **Licensee must provide at least a qualitative risk assessment derived from the PRA**
- **Startup criteria are applied to any condition other than Mode 1 operation or cold shutdown and the licensee must identify which criterion is satisfied**
- **NRR must issue follow-up license amendment in 4 weeks, if appropriate**
- **Agency-wide LAN-accessible database/tracking system to be operational early 1996; currently tracking via individual office databases; will include requests rejected before formal submittal**
- **Approval/denials are posted on electronic bulletin board**

## LINE ITEM IMPROVEMENTS

<u>Date</u>	<u>GL No.</u>	<u>MPA</u>	<u>Subject</u>
05/03/84	84-13	--	Technical Specifications for Snubbers (removal of list)
06/04/87	87-09	D024	Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on Applicability of Limiting Conditions for Operation and Surveillance
03/22/88	88-06	D023	Removal of Organization Charts from Technical Specifications Administrative Control Requirements
08/02/88	88-12	D022	Removal of Fire Protection Requirements from Technical Specifications
10/04/88	88-16	D021	Removal of Cycle-Specific Parameter Limits from Technical Specifications
01/31/89	89-01	D025	Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of Technical Specifications and Relocation of Procedural Details of RETS to the Offsite Dose Calculational Manual or the Process Control Program
08/21/89	89-14	D026	Removal of the 3.2.5 Limit on Extending Surveillance Intervals
02/01/90	90-02		Alternative Requirements for Fuel Assemblies in the Design Features Section of Technical Specifications
12/11/90	90-09	D028	Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions
01/04/91	91-01	D029	Removal of the Schedule for Withdrawal of Reactor Material Specimens from Technical Specifications
04/02/91	91-04	D031	Changes in Technical Specifications Surveillance Intervals to Accommodate a 24-month Fuel Cycle
05/06/91	91-08	D030	Removal of Component Lists from Technical Specifications
06/27/91	91-09	D032	Modification of Surveillance Requirements for the Electrical Protective Assemblies in Power Supplies for the Reactor Protection System

**LINE ITEM IMPROVEMENTS**  
(continued)

<u>Date</u>	<u>GL No.</u>	<u>MPA</u>	<u>Subject</u>
11/07/81	81-18	N/A	<del>NRC Inspection Manual Guidance on Resolution of Degraded and Nonconforming Conditions and Operability Determinations</del>
07/31/92	90-02/S1	D027	Alternative Requirements for Fuel Assemblies in the Design Features Section of Technical Specifications
09/27/93	93-05	D033	Reduce Surveillance Requirements for Testing During Power Operation (NUREG-1366)
12/28/93	93-07	D034	Administrative Controls for Emergency and Security Plans
12/29/93	93-08	D035	Relocation of Technical Specification Tables of Instrument Response Time Limits
05/31/94	94-01	----	Removal of Accelerated Testing and Special Reporting Requirements for Emergency Diesel Generators
04/06/95	N/A		<b>Internal Guidance Memo:</b> Guidance for License Amendments Relocating Turbine Overspeed Specifications to the FSAR
12/12/95	AL 95-06		Relocation of Technical Specification Administrative Controls Related to Quality Assurance
12/15/95	95-10	----	Relocation of Selected Technical Specifications Requirements Related to Instrumentation ( <i>incore detectors, seismic monitors, meteorological instruments, chlorine detectors, loose parts monitors, explosive gas monitors, turbine overspeed protection</i> )
01/31/96	96-03	----	Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits (PTLR)

**LINE ITEM IMPROVEMENTS**  
(continued)

<u>Date</u>	<u>GL No.</u>	<u>MPA</u>	<u>Subject</u>
Pending			Relocation of Selected Technical Specifications Requirements Related to Administrative Controls
Planned			Improvements to the Technical Specification Requirements Related to Design Features
Possible			Relocation of Selected TS Requirements Related to Plant Systems (snubbers, sealed sources, area temperature monitoring)
Possible			Relocation of Selected TS Requirements Related to Reactivity Control Systems (boration systems, rod position indicators, rod drop time)

# NRC MEETING

February 20, 1996  
10:00 AM to 2:00 PM  
Southern Nuclear Operating Co.  
40 Inverness Center Parkway  
Room 230 (Board Room)  
Birmingham, Alabama

## Attendees:

NRC: S. Ebnetter, A. Gibson, H. Berkow, J. Johnson, C. Casto, C. Christianson, P. Skinner, B. Holbrook, C. Ogle, T. Ross, K. Jabbour, B. Siegel, L. Wiens, D. Wheeler, D. Hood  
SNC: G. Hairston, J. Woodard, T. Beckham, K. McCoy, D. Morey, L. Long

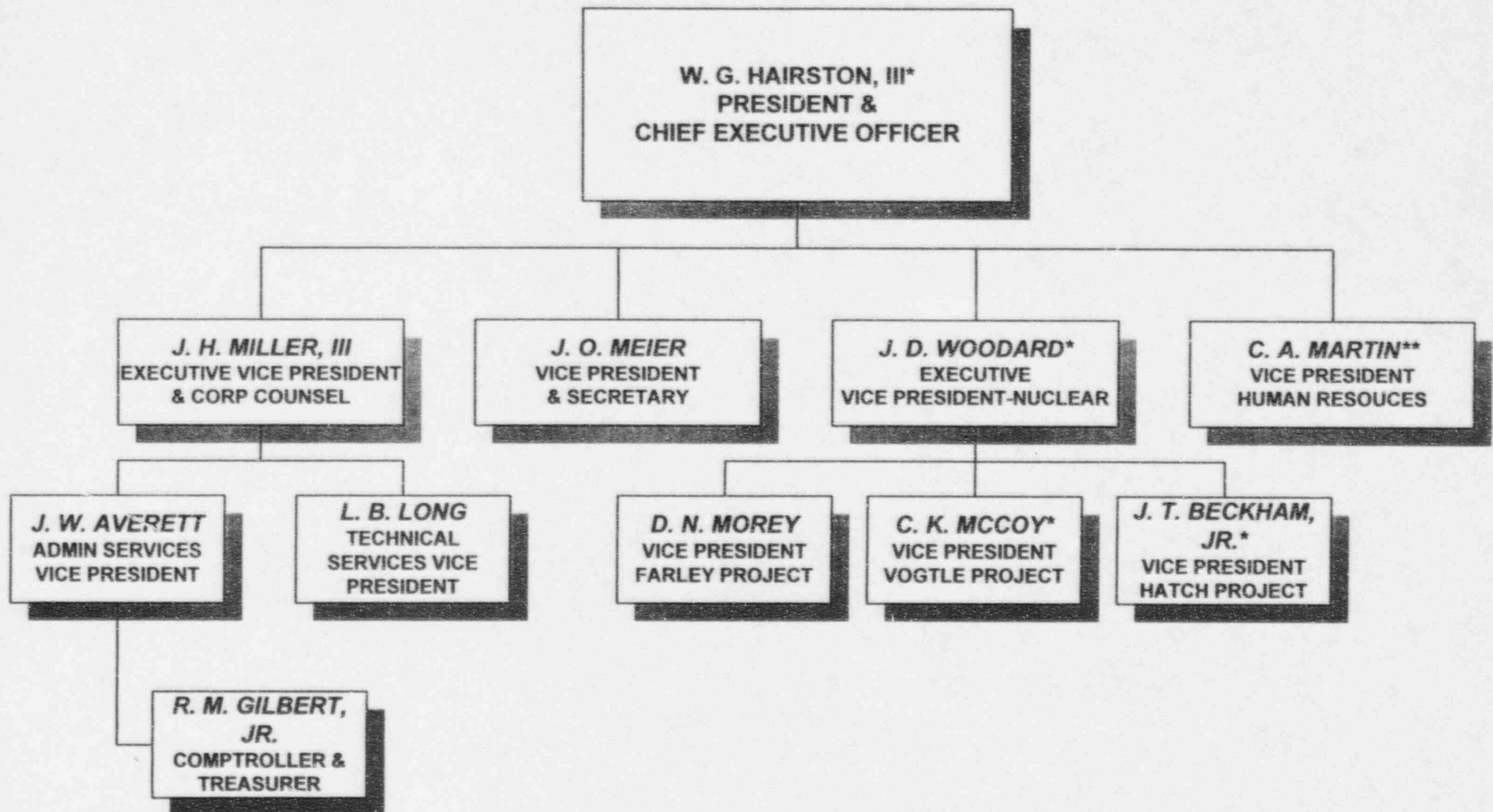
## Agenda

1. Opening Remarks	G. Hairston	9:30-9:35 AM
2. Comments	S. Ebnetter	9:35-9:45 AM
3. Plant Status - Farley	D. Morey	9:45-9:50 AM
4. Plant Status - Hatch	T. Beckham	9:50-9:55 AM
5. Plant Status - Vogtle	K. McCoy	9:55-10:00 AM
6. SNC Organization	J. Woodard	10:00-10:15 AM
7. Engineering Design	D. Morey	10:15-10:30 AM
8. Technical Services	L. Long	10:30-10:45 AM
9. Major Problems - Farley	D. Morey	10:45-10:55 AM
10. Major Problems - Hatch	T. Beckham	10:55-11:05 AM
11. Major Problems - Vogtle	K. McCoy	11:05-11:15 AM
12. Notice of Enforcement Discretion Policy	H. Berkow	11:15-11:45 PM
13. Lunch	Board Room	11:45-12:30 PM
14. *Tours :		12:30-1:30
- Projects	T. Beckham	
- Southern Company Services	D. Morey	

## Additional Information

\* Split into two groups -- approximatley 30 minutes for each tour.

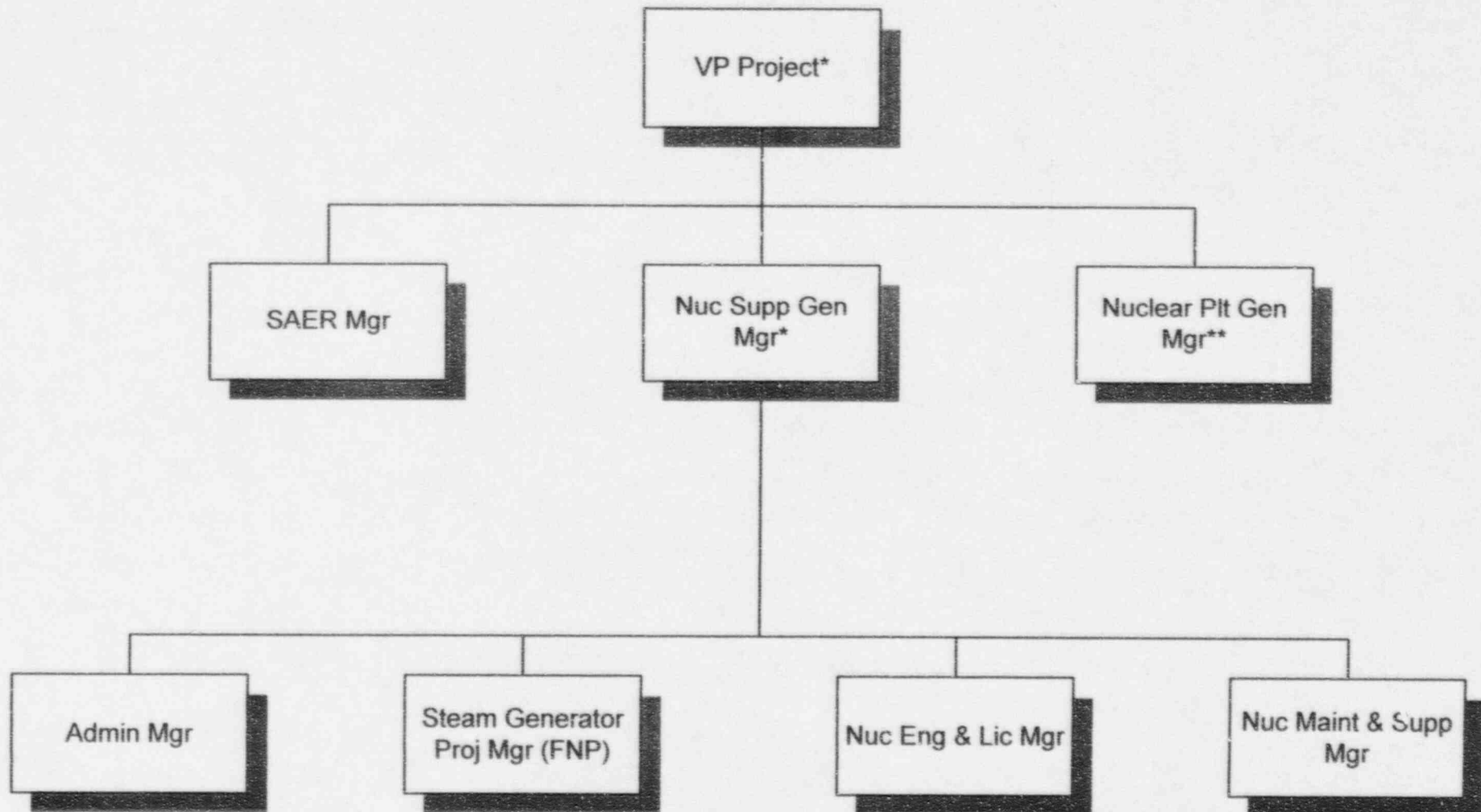
# SOUTHERN NUCLEAR OPERATING COMPANY



\*Shared officer of Georgia Power Company

\*\*HR officer of all system companies

## TYPICAL PROJECT ORGANIZATION

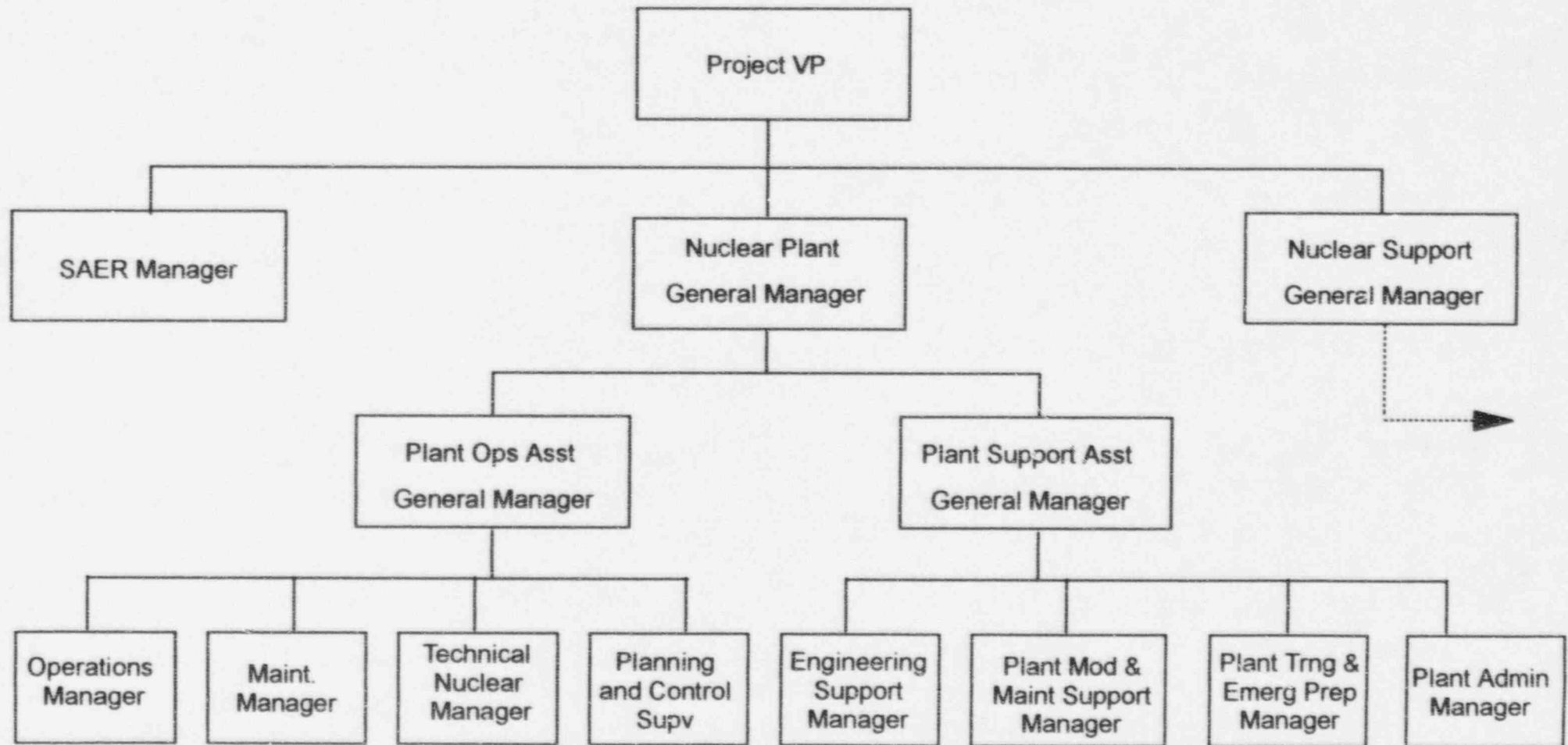


\*GPC shared employee for Hatch and Vogtle

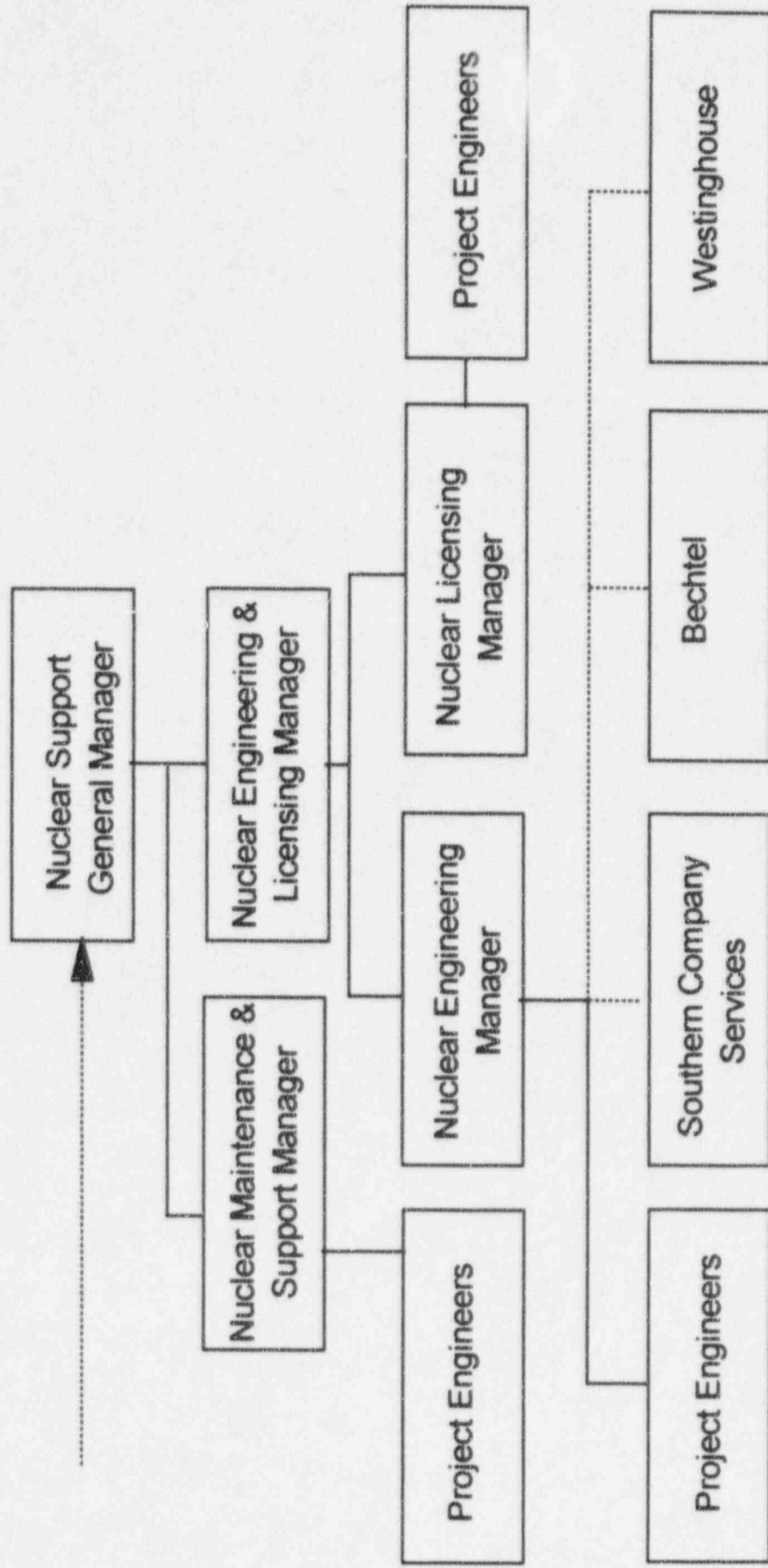
\*\*GPC employee for Hatch and Vogtle



# Project Organization



# Offsite Project Organization



# **Providers of Engineering Services**

- Southern Company Services
- Bechtel
- NSSS & Turbine Generator Suppliers  
(Westinghouse, GE)
- Specialty / Equipment Services Engineers
- Agents of the Owner Utility

# **Southern Company Services**

- Preferred Designer
  - Subsidiary of The Southern Company
  - Proximity to SNC
  
- Interface
  - Project Engineering Design
  - Safety Review Board
  - Daily Plant Status Calls
  - Personal involvement at all levels of management in critical technical issues
  - Standardization Task Forces (with SNC)

# **SCS Engineering Actual Headcount**

**as of January 1, 1996**

## **Direct Support**

Farley Project	88
Vogtle Project	77
Hatch Project	103
Nuclear Technical Services (EQ, Licensing, Stress, Control Systems, etc.)	36
Nuclear Project Support (Administration- budget, schedules, etc.)	21
Total	325

## **Indirect Support**

Consulting & Testing Services	117
Engineering Support Services (Doc. Control, QA, etc.)	46
Total	163

# **SCS Project Responsibilities**

- Design Changes
- Engineering and Consulting
- Configuration Management & Document Services
- Special Engineering & Testing
- Site Support and Staff Augmentation

# **Bechtel**

- Consultant
  - Research plant design and licensing basis
  - Review technical opinions or designs developed by SCS or the NSSS designer
  - Participate in resolving generic industry issues
  - Support SNC in team inspections



## **Bechtel (cont'd)**

- Value Added:

- Flexibility - Alternate source for engineering design
- Access to nuclear staff specialty design
- Recognized nuclear experience in regulatory and financial arenas
- Healthy source of competition - continuous benchmarking capabilities for design

- Organization:

- Common engineering support group for SNC
- Actual headcount of 30 as of January 1, 1996

# **NSSS & Turbine Generator Suppliers (Westinghouse, GE)**

- Fuels
- NSSS & Turbine Generator Component Engineering

# **Specialty / Equipment Services Engineers**

- **Pump expertise**
  - Dr. Makay
- **Lubrication expertise**
  - Dr. Bolt
- **Vendor component expertise**
  - Atwood Morrell - TDAFW pumps
  - Ingersol Rand - RHR pumps
  - Copes - Vulcan - valves
  - Vectra - MOVs
  - Graver - Demineralizers
  - Fairbanks Morse - Diesel Generators

# **Agents of the Owner Utility**

- **Southern Nuclear Technical Services**
  - Environmental Issues
  - PRA Analysis
  - Licensing Questions
- **APCO / GPCO Environmental Services**
- **GPCO Repair Shop**
  - E.Q. of Motor Rewinds
- **APCO / GPCO Power Delivery**
  - Switchyard Modifications

# Engineering Budget - 1996

\$15 million

Farley

\$16 million

Hatch

\$11 million

Vogtle

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\$42 million

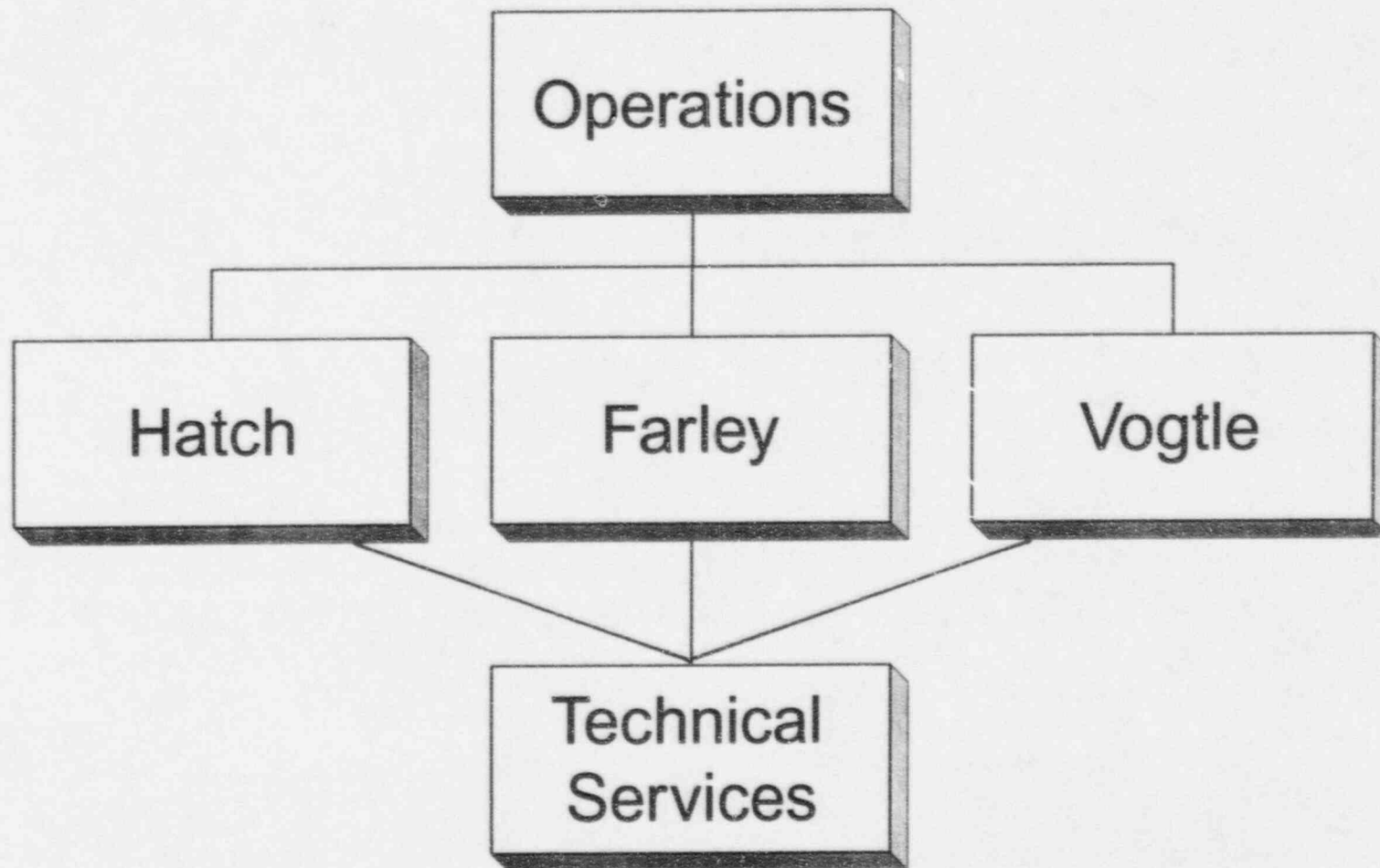
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Total

# **TECHNICAL SERVICES**

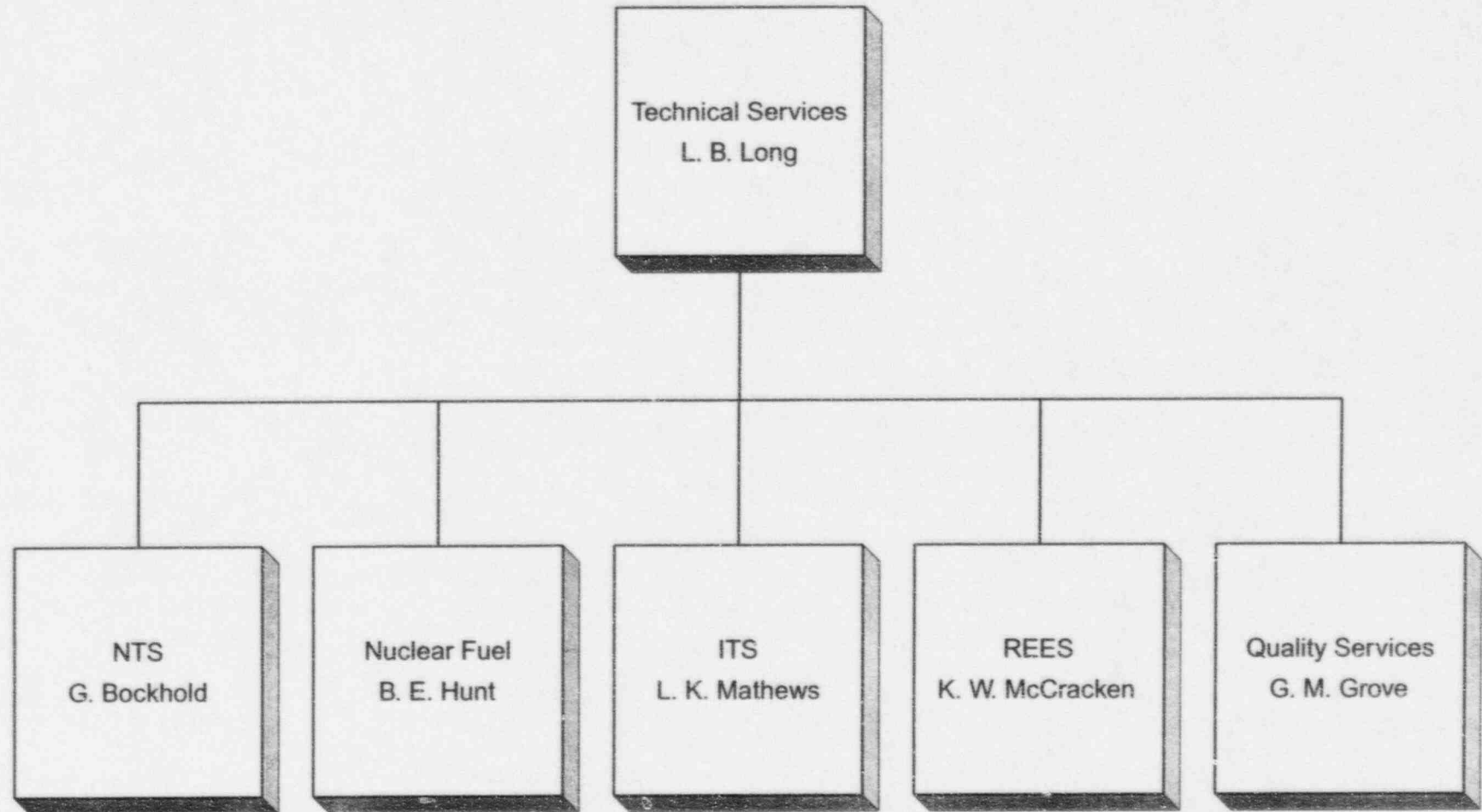
- We work for the Projects

# **SOUTHERN NUCLEAR**





# TECHNICAL SERVICES



# **NUCLEAR TECHNICAL SERVICES**

- Reengineering
- ALWR

# **NUCLEAR FUEL**

- Nuclear Fuel Services
  - Procurement, QA, Economics
- Core Analysis - BWR & PWR
  - Fuel Cycles, Ops Support, Licensing

# **INSPECTION & TESTING SERVICES**

- ISI/IST Programs & Plans
- E/C Program
- Infrared Program
- NDE Management
- Code Committees

# **REGULATORY, ENGINEERING & ENVIRONMENTAL SERVICES**

- Licensing Services
- Engineering Services
- Environmental Services

# **QUALITY SERVICES**

- QSL
- Supplier Audits
- Contractor BI And FFD Audits
- Corporate Audits

# **Plant Hatch Top Ten Major Problems**

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- Unit 1 Fuel Leakers
- Motor-Operated Valve Testing & Upgrades
- Spent Fuel & Radwaste Disposal
- Shroud Cracking and RPV Internal Issues
- Procedural Compliance
- Main Generator Reliability
- Safety Relief Valve Pilot Leakage
- Unit 1 Reactor Feedpump AC Oil Pump Reliability
- Steam Cycle Flow Accelerated Corrosion
- Low Pressure Turbine Dovetail Cracking



# **Plant Farley**

## **Top Ten Major Problems**

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- Industrial Safety
- Personnel Errors
- Steam Generators
- Maintenance
- Reactor Trips
- Fuel
- Service Water Issues
- Plant Material Condition
- Radiation Exposure
- Chemical Control Program

# **Plant Farley Top Ten Major Problems**

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- Industrial Safety
- Personnel Errors
- Steam Generators
- Maintenance
- Reactor Trips
- Fuel
- Service Water Issues
- Plant Material Condition
- Radiation Exposure
- Chemical Control Program

# Plant Hatch

## Top Ten Major Problems

---

- Unit 1 Fuel Leakers
- Motor-Operated Valve Testing & Upgrades
- Spent Fuel & Radwaste Disposal
- Shroud Cracking and RPV Internal Issues
- Procedural Compliance
- Main Generator Reliability
- Safety Relief Valve Pilot Leakage
- Unit 1 Reactor Feedpump AC Oil Pump Reliability
- Steam Cycle Flow Accelerated Corrosion
- Low Pressure Turbine Dovetail Cracking

# Plant Vogtle

## Top Ten Major Problems

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- Human Performance
- NSCW System Cooler Debris
- Reactor Coolant Pump Turning Vane to Thermal Barrier Flange
- Main Generator Stator Bar Water Leakage
- Loss of Boraflex in the Spent Fuel Pool
- Safe Work Practices
- Unit 2 Reactor Coolant Pump Balance Issue
- Cost Competitiveness/Cost of Product
- Containment Cooler Tube Leakage
- Heater Drain System Capability and Reliability