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March 13, 1996

LCV-0767-A

Docket No. 50-424  
50-425

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

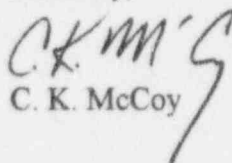
Ladies and Gentlemen:

**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 (NRC) Inspection Reports 50-424,425/95-31, which documents the inspection conducted by NRC Resident Inspectors from December 17, 1995, through January 27, 1996.

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

Sincerely,

  
C. K. McCoy

CKM/AFS

Enclosure: Reply to NOV 50-424,425/ 95-31

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

U. S. Nuclear Regulatory Commission  
Mr. S. D. Ebnetter, 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; 425/95-31**

**VIOLATION "A", 50-424 / 95-31-01**

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

"During the NRC inspection conducted on December 17, 1995, through January 27, 1996, violations of NRC requirements were identified. In accordance with the 'General Statement of Policy and Procedure for NRC Enforcement Actions,' NUREG-1600, the violations are listed below.

- A. Technical Specification 6.7.1.a, requires that written procedures be implemented for the activities identified in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Revision 2, February 1978, requires that procedures defining authorities and responsibilities for safe operation and shutdown be implemented.

Procedure 10000-C, Conduct of Operations, Revision 33, September 29, 1995, establishes the responsibilities of Operations Department personnel for conduct of plant operations and requires that control room personnel be cognizant of the status of plant equipment.

Contrary to the above, on January 26 and 27, 1996, control room personnel were not cognizant of the status of plant equipment in that operators failed to detect that valve 1HV-8220, Reactor Coolant System Hot Leg Post Accident Sampling System Sample Isolation Valve, was in the incorrect position. This condition existed for approximately 20 hours.

This is a Severity Level IV violation (Supplement I) (Unit 1 only)."

**RESPONSE TO VIOLATION "A", 50-424 / 95-31-01**

**Admission or Denial of the Violation:**

This violation occurred as stated in the notice of violation.

**Reason for the Violation:**

Reactor Coolant System Hot Leg Post Accident Sampling System Sample Isolation Valve, 1HV-8220 was in the incorrect position as a result of the manipulation of other reactor coolant system sample valves. Due to previous problems experienced with 1HV-8220, an engineering review was conducted on October 13, 1995, and determined that under certain circumstances this valve would inadvertently cycle open. However, the engineering review also stated that 1HV-8220 was capable of performing its intended safety function and should continue to be used until it was replaced. Additionally, an Operations Standing Order was written for operators to verify

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1HV-8220 closed following the performance of activities that could inadvertently cycle the valve open. However, operators are not always immediately aware that certain activities, such as chemistry sampling, have occurred.

**Corrective Steps Which Have Been Taken and the Results Achieved:**

1. As an interim measure, 1HV-8220 has been tagged out in the closed position to prevent it from inadvertently cycling open. With the exception of sampling activities, this valve will remain tagged out until it can be tested to determine if adjustments to the reed switches have improved valve operations.

**Corrective Steps Which Will Be Taken to Avoid Further Violations:**

1. A design change has been issued to install a different valve design and will be completed by June 30, 1996.
2. This event will be discussed in the licensed operator requalification program to emphasize operator awareness of sampling activities. This training will be completed by May 27, 1996.

**Date When Full Compliance Will Be Achieved:**

Full compliance was achieved on January 27, 1996, when the valve was returned to the correct position.

**VIOLATION "B", 50-425 / 95-31-02**

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

"During the NRC inspection conducted on December 17, 1995 through January 27, 1996, violations of NRC requirements were identified. In accordance with the 'General Statement of Policy and Procedure for NRC Enforcement Actions,' NUREG-1600, the violations are listed below.

- B. Technical Specification 6.7.1 a, requires that written procedures be implemented for the activities identified in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Revision 2, February 1978, specifies that procedures be implemented for manipulation of the incore detector system and that administrative procedures be implemented for equipment control.

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**VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2  
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Procedure 87006, Movable Incore Detectors System Operating Instructions, Revision 3, September 18, 1992, provides instructions for proper operation of the incore detectors and requires that the detectors be returned to their storage locations following use.

Procedure 00308-C, Independent Verification Policy, Revision 9, July 16, 1995, provides instruction for independent verification and requires that the independent verifier of a task perform his verification independent of the original performer of a task.

Contrary to the above on December 12, 1995:

1. An engineer operating the movable incore detector system, failed to properly return the detectors to their stored positions as required by procedure 87006.
2. A licensed senior reactor operator failed to perform an adequate independent verification of the stored position of the movable incore detectors. Specifically, he inappropriately relied upon the verbal instructions of the engineer who stored the detectors and as a result failed to discover that the detectors were not fully stored.

This is a Severity Level IV violation (Supplement I) (Unit 2 only)."

**RESPONSE TO VIOLATION "B", 50-425 / 95-31-02**

**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 as described in the following paragraphs:

1. At the completion of the flux map the engineer is required to perform a two step process to fully insert the detectors into their proper storage location. The applicable procedural steps were not signed-off as they were completed, instead were signed collectively by the responsible engineer at the completion of the restoration.
2. During the independent verification (IV) process, the engineer responsible for completing the flux map and restoration was present with the USS and directed the USS to an incorrect indication on the movable incore detector system panel. As a result of the engineer's presence, the USS improperly performed the IV. Because of this, his actions were based on incorrect information which resulted in his failure to recognize that the detectors were not properly stored.

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**Corrective Steps Which Have Been Taken and the Results Achieved:**

1. The engineer involved was counseled on job performance, attention to detail and procedure compliance. Additionally, the USS was counseled concerning the importance of maintaining independence while performing independent verifications.
2. The engineer involved conducted a briefing discussing this event in the licensed operator requalification program with emphasis on performing independent verifications.
3. Engineering Support Department personnel were briefed on this event.

**Corrective Steps Which Will Be Taken to Avoid Further Violations:**

No additional corrective actions are planned at this time.

**Date When Full Compliance Will Be Achieved:**

Full compliance was achieved on December 18, 1995, when the detectors were placed in the fully stored position and independently verified.