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Georgia Power
the southern electric system

April 1, 1996

LCV-0716-C

Docket Nos. 50-424
50-425

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
REVISED REPLY TO A NOTICE OF VIOLATION

On December 22, 1995, Georgia Power Company submitted a response to the Nuclear Regulatory Commission (NRC) concerning a violation identified in NRC Inspection Reports 50-424;425/95-27 for the Nuclear Service Cooling Water (NSCW) system. During the implementation of corrective actions described in the violation response, problems were encountered flushing the Unit 2 NSCW pump motor coolers. Unlike the Unit 1 pump motor cooler piping design, the Unit 2 piping does not have drain and vent valves upstream of the flow orifices where the flush water can be introduced, thereby making it difficult to flush the piping and orifices. Item number 2 for "Corrective Steps Which Will Be Taken To Avoid Further Violations" has been revised to include an alternative method for verifying the supply piping to the motor/lube oil coolers is free of debris.

Corrective actions for item numbers 4 and 5 for "Corrective Steps Which Will Be Taken To Avoid Further Violations" have been completed. These corrective actions were to install screens over the Unit 1 and 2 NSCW tower sumps and to perform an engineering analysis to evaluate the source of metallic debris found in some of the flow orifices. As a result of this analysis, a pump inspection plan has been developed to inspect and repair any damage found on the pumps.

Sincerely,

C. K. McCoy

CKM/JAB/gmb

Enclosure: Revised Reply to NOV 50-424,425/95-27-04
cc: (See next page)

IE01
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cc: Georgia Power Company
Mr. J. B. Beasley, Jr.
Mr. M. Sheibani
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebneter, Regional Administrator
Mr. L. L. Wheeler, Licensing Project Manager, NRR
Mr. C. R. Ogle, Senior Resident Inspector, Vogtle

LCV-0716-C

ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2
REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORTS 50-424; 425/95-27

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

> "During the NRC inspection conducted on October 22 through November 18, 1995, a violation of NRC requirements was identified. In accordance with the 'General Statement of Policy and Procedure for NRC Enforcement Actions,' NUREG-1600 (60 FR 34381; June 30, 1995), the violation is listed below.
>
> 10 CFR 50, Appendix B, Criterion XVI, Corrective Action, requires that corrective actions be taken to preclude repetition of significant conditions adverse to quality.
>
> Contrary to the above, the licensee's corrective actions taken in response to two partially obstructed Nuclear Service Cooling Water System (NSCW) orifices detected in January 1995 were inadequate to preclude repetition. Specifically, six NSCW system orifices were found to be partially obstructed with debris between August 25, 1995, and September 3, 1995."

This is a Severity Level IV violation (Supplement I).

RESPONSE TO VIOLATION (50-424,425/ 95-27-04)

Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

Reason for the Violation:

Corrective actions planned to address the two partially obstructed Unit 2 NSCW orifices detected in January 1995 during NSCW cooler flow testing, included design changes for installing solid plates over the NSCW pump well gratings for Unit 2 and replacing the existing plates over the Unit 1 pump wells to provide complete coverage. In addition, basin screens between the pump and basin area, that were in place in Unit 2, were also planned to be installed in Unit 1. These corrective actions were scheduled for August 1995. These measures were intended to reduce the possible introduction of foreign material into the NSCW system. After discovery of the August 25, 1995, low flow condition, Georgia Power Company decided to check flows on all safety-related NSCW small orifice motor/lube oil coolers. This led to the discovery of five additional low flow conditions caused by partially obstructed orifices which revealed that the problem was more widespread than originally indicated by January 1995 flow test results. Subsequent reviews conducted by the design architect engineer indicated that the degraded flows to the motor and pump coolers did not have an adverse affect on operability of the components.

ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2
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NRC INSPECTION REPORTS 50-424; 425/95-27

Corrective Steps Which Have Been Taken and the Results Achieved:

1. Plates have been installed over the pump well openings and kick plates and screens have been installed around the basin railing in order to reduce foreign material from entering the basin and pump shaft wells.

2. Flow measurements were conducted for all safety-related NSCW small diameter orifice motor/lube oil coolers. A total of five coolers were identified with lower than desirable flows. These flow orifices were removed and the lines flushed of debris.

3. A representative sample of NSCW tower basin walls have been inspected on each tower with no significant degradation noted. The NSCW basin floors were also vacuumed of debris.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

1. The scope of Generic Letter 89-13 (heat exchanger testing and inspections) was expanded for the 1R6 refueling outage which began on March 3, 1996. This expanded scope testing and inspections will also be conducted during the 2R5 refueling outage currently scheduled to begin on September 15, 1996.

2. The supply piping to safety-related NSCW small diameter orifice motor/lube oil coolers will be verified to be free of debris by either removing the orifice and flushing the piping or by visual inspection of the piping to the extent possible. Estimated completion will be the end of the 1R6 refueling outage which began on March 3, 1996 and the 2R5 refueling outage, currently scheduled to begin on September 15, 1996.

3. Flow testing on all safety-related NSCW small diameter motor/lube oil coolers will continue on a monthly basis until a high level of confidence exists that the source(s) of debris have been eliminated.

4. A design change has been implemented to prevent debris introduction from the NSCW tower sump pump discharge.

5. An engineering analysis to determine the source of the metallic debris found in some of the flow orifices has been completed. As a result of this analysis, a pump inspection plan has been developed to inspect and repair any damage found on the pumps.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on August 30, 1995, when additional corrective actions were developed to address the debris in the NSCW system.