



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

JUL 24 1984

Report Nos.: 50-424/84-14 and 50-425/84-14

Licensee: Georgia Power Company
P. O. Box 4545
Atlanta, GA 30302

Docket Nos.: 50-424 and 50-425

License Nos.: CPPR-108 and CPPR-109

Facility Name: Vogtle 1 and 2

Inspection Dates: June 18 - 22, 1984

Inspection at Vogtle site near Waynesboro, Georgia

Inspector: R. W. Wright 7/18/84
R. W. Wright Date Signed

Approved by: C. M. Upright 7/18/84
C. M. Upright, Section Chief Date Signed
Division of Reactor Safety

SUMMARY

Areas Inspected

This routine unannounced inspection involved 35 inspector-hours on site in the areas of nonconformance controls, conduct of audits, proposed revisions to procedure DC-A-03, and followup on a previously identified inspection item.

Results

Of the four areas inspected, no violations or deviations were identified in two areas; two violations were found in the performance of audits (Three audits not documented, issued, or followed up in accordance with ANSI N45.2.12 requirements - paragraph 6; Incomplete corrective action for closure of audit findings - paragraph 6).

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *W. T. Nickerson, Deputy Project General Manager
- *M. H. Googe, Assistant Project Construction Manager
- *C. W. Hayes, Vogtle Quality Assurance Manager
- *E. D. Groover, Quality Assurance Site Manager
- *T. L. Weatherspoon, Assistant Manager of Quality Control
- *J. L. Blocker, Assistant Manager of Quality Control
- *G. A. McCarley, Project Compliance Coordinator
- *D. M. Fiquett, Manager of Field Construction Operations
- R. W. McManus, Manager of Quality Control
- B. C. Harbin, Manager of Engineering Support
- C. Myers, Senior Construction Analyst
- I. D. Innes, Assistant Project Section Supervisor (Civil)
- G. Reid, Junior Engineer, Engineering Support (Electrical)
- P. T. Murphy, Mechanical Section Engineering Supervisor

Other Organizations

- *D. L. Kinnsch, Project Field Engineer, Bechtel

NRC Resident Inspector

- *W. F. Sanders

- *Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on June 22, 1984, with those persons indicated in paragraph 1 above. This exit meeting was continued at the Region II office on July 2, 1984, at the request of the GPC QA staff. Additional information was provided on corrective action to problems identified during internal audits in a meeting July 5, 1984, at the GPC corporate office between the GPC General Manager of Quality Assurance and the Region II Operational Programs Branch Chief and Quality Assurance Programs Section Chief. The licensee acknowledged the following findings:

Violation 424, 425/84-14-01, Three Audits Not Documented, Issued, or Followed Up In Accordance With ANSI N45.2.12.

Violation 424, 425/84-14-02, Incomplete Corrective Action For Closure Of Audit Findings.

Inspector Followup Item 424, 425/84-14-03, Revisions/Clarifications to Revision 11 of Procedure GD-T-01.

3. Licensee Action on Previous Enforcement Matters

Not inspected.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Nonconformance Controls (35100B)

The inspector examined Revision 11 to Procedure GD-T-01, Nonconformance Control, dated June 14, 1984. This procedure was issued to establish measures to comply with Criterion XV and XVI of 10 CFR 50, Appendix B. The subject procedure is for use by GPC personnel and does not replace any Contractor's approved nonconformance control program. By this procedure, nonconforming conditions will be reported on either a deviation report or a discrepancy punchlist (DP). A DP nonconformance is to be initiated for deficient items which have been predispositioned as "Rework Items" in existing Field Procedures and for software nonconformances. DP items must be corrected within 14 calendar days of the initiation of the DP or they get upgraded to a deviation report. All other nonconformances are to be reported on the usual deviation report (DR) system.

Review of Revision 11 resulted in the inspector expressing the need to responsible GPC site personnel that a few statements be added and a section further clarified in the subject procedure. These additions and clarifications are as follows:

- ° A statement added saying that "Hardware deficiencies that have been previously accepted by QA/QC must be documented in the DR system." (These are not punchlist items.)
- ° In Section 8.0, Discrepancy Punchlist, provide a general statement describing when punchlist discrepancies may be used.
- ° In Section 8.6, expand or further clarify the inspection supervisor's responsibilities for review of DP items to include assuring that they are properly classified and not potentially significant. (i.e., they are truly punchlist items and not DRs)
- ° Add instructions that provide for reviewing of punchlist discrepancies for trending purposes.
- ° Sections 6.10.1 and 6.10.3 require that engineers evaluate each deviation report to decide if a condition exists which needs action to prevent recurrence or indicates a breakdown in the activities essential to safe plant operations. Guidelines, criteria, nor standards are needed to establish the basis of such decisions.

The above mentioned inspector concerns were brought to the attention of GPC management at the exit meeting and identified as IFI 424, 425/84-14-03, Revisions/Clarifications to Revision 11 of Procedure GD-T-01. When fully implemented, it appears the GPC's latest approach to nonconformance control will strengthen and further enhance this area. The licensee must continue with its efforts of identifying deficient items in all disciplines that can be classified as rework items (punchlist items), placing these items in appropriate Field Procedures, and providing adequate training as necessary in the use of this revised procedure.

6. Audit Reviews (35060B)

The inspector selected audits/findings for review from the GPC Audit Number Control Log and the QA Audit Finding Status List to ascertain that audits of quality activities were properly performed in accordance with established procedures, that audit data was analyzed by the QA organization, that the resulting report indicate any quality problems and the effectiveness of the QA program including the need for reaudit of deficient areas, and that audit results are reported to management for review and assessment. The following acceptance criteria were examined to verify the inspection objectives:

- ° QA Department Procedure QA-05-01, Field Audits
- ° QA Department Procedure QA-05-20, QA Trend Program
- ° QA Department Procedure QA-04-02, Significant Deficiency/Defect Reporting - (10 CFR 50.55(e)/10 CFR 21)
- ° Regulatory Guide 1.144, Auditing of QA Programs for Nuclear Power Plants
- ° ANSI N45.2.12, Requirements for Auditing of QA Programs for Nuclear Power Plants
- ° Vogtle PSAR Chapter 17

Examination of the Audit Number Control Log revealed several relatively old audits which apparently have not been completed due to certain remarks entered on the subject log (cancelled, deferred, will not be issued) or the completion date left blank on the log. Discussions with responsible auditors and the QA Site Manager satisfactorily resolved the cancelled and deferred audits listed, but the reasoning for three audits that were not issued to date was deemed unacceptable. Three audits (CD01-81/75 - Excavation and Backfill, CD06-81/80 - Coatings, SP01-82/124 - QA Audit of USNRC Items) were planned, scheduled, and executed with exit meetings conducted but the audit results were never published, issued, nor is there objective evidence that deficient areas identified in these audits have been satisfactorily resolved. The three audits conducted were not documented, issued, nor properly followed up in accordance with ANSI N45.2.12 requirements and this item was identified to the licensee as Violation 424, 425/84-14-01.

Copies of draft reports written by the responsible auditors for the three mentioned audits were obtained and examined by the inspector. Examination revealed that although many of the auditor's findings/conclusions appear insignificant at this time, some deficiencies identified definitely merit formal documented resolution and closure. The licensee at the exit meeting and at the Region II QA conference conducted at licensee request on July 2, 1984, agreed to formally resolve and document each finding identified in these audits, regardless of the validity of the finding or its significance.

Audit CD06-81/80, Coatings, was conducted to follow-up and presumably close extensive programmatic audit findings (AFR 235 and 236) that were identified in a previous coatings audit CD06-81/51 conducted 7/16 - 8/4/81. Examination of the subject audit findings reports revealed they had both been closed on 12/3/81; however, the corrective action review and verification indicated that closure actions were still pending for AFR 235 and some facets still remained inadequate for the closure of AFR 236. Based on the inspector's review of the audit information compiled (draft reports) by the auditors during the performance of audit CD06-81/80 (which was never issued), it appears that AFRs 235 and 236 were prematurely closed in that coating program deficiencies originally identified in audit CD06-81/51 still existed or were unresolved at the time these AFRs were closed. This item was identified as Violation 424, 425/84-14-02, Incomplete Corrective Action for Closure of Audit Finding.

7. Proposed Revisions to Procedure DC-A-03 (35100B)

The Region II inspector, along with the NRC Resident Inspector, attended a briefing given by GPC personnel concerning proposed changes to Procedure DC-A-03 R12, Change Requests and Change Notices. After the briefing, the resident inspector requested the utility to submit these changes in writing to Region II since all prior changes that affected the authorization to continue work were handled in this manner. The licensee agreed to this request.

8. Inspector Followup Items (IFIs) (92701B)

(Closed) IFI 424, 425/84-06-01: Revision of Upper Tier Documents to Reflect HVAC Change.

The inspector examined Bechtel's VEGP Project Reference Manual Change Notice CN (APP 2)-14-1 dated 5/10/84 and Revision 1 of Part C, Section 6.1 dated 6/7/84 to the GPC Vogtle Project Policy and Procedures Manual. This review verified that applicable procedures contained within the subject manuals had been updated to permit the ATCW system to be applied to vendor drawings for HVAC duct supports, bridging, and bracing.