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C. K. McCoy
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Georgia Power

The Southern Electric System

September 29, 1992

ELV-04034
002337

Docket Nos. 50-424
50-425

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
REPLY TO A NOTICE OF VIOLATION

Pursuant to 10 CFR 2.201, Georgia Power Company submits the enclosed response to the violation identified in NRC Inspection Reports 50-424/92-17 and 50-425/92-17 concerning the inspection conducted by Mr. P. T. Burnett during the period of July 27-31, 1992.

Sincerely,

C.K. McCoy
C. K. McCoy

CKM/NJS/gmb

Enclosure

xc: Georgia Power Company
Mr. W. B. Shipman
Mr. M. Sheibani
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebnetter, Regional Administrator
Mr. D. S. Hood, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

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ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT
REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORTS 50-424/92-17 AND 50-425/92-17

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

"10 CFR 50, Appendix B, Criterion V, and the licensee's accepted quality assurance program, Final Safety Analysis Report Section 17.2.5, require that activities affecting quality shall be prescribed by procedures appropriate to the circumstances and shall be accomplished in accordance with those procedures.

Technical Specification 6.7.3 permits temporary changes to required procedures provided that the intent of the original procedure is not altered; the change is approved by two members of plant management, at least one of whom holds a Senior Operator license; and the change is documented and approved by the appropriate authority within 14 days of implementation. The licensee's administrative procedure 0052-C (Revision 7), Temporary Changes to Procedures, implements the requirements of Technical Specification 6.7.3.

Contrary to the above, the twelve procedures reviewed in 88xxx-C series of procedures each included step 6.1.4. Step 6.1.4 gives performers of these procedures the latitude to make changes to procedures that are not pre-approved by two members of management (including one Senior Operator), or formally documented for review and approval by the appropriate authority.

This is a severity level IV violation (Supplement 1)."

RESPONSE TO VIOLATION

Admission or Denial of the Violation

A violation occurred in that inappropriate steps were included in certain reactor engineering procedures that could have allowed bypassing the temporary procedure change process.

Reason for the Violation

The reason for this violation was inadequate procedural guidance. Step 6.1.4 of the reactor engineering procedures was originally conceived as additional guidance for those instances when difficulties were encountered during performance of reactor engineering procedures. It was never intended to circumvent the plant rules for following procedures or the temporary change process. However, it could be perceived as allowing the review and approval process of Procedure 0052-C to be bypassed. We believe there were no instances or examples identified where a temporary change to a procedure should have been used but was not.

ENCLOSURE (CONTINUED)

VOGTLE ELECTRIC GENERATING PLANT
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NRC INSPECTION REPORTS 50-424/92-17 AND 50-425/92-17

Corrective Steps Which Have Been Taken and the Results Achieved

- o Interoffice correspondence was issued to appropriate reactor engineering personnel informing them to not utilize step 6.1.4 in the 87000 and 88000 series procedures.
- o All the reactor engineering procedures that contain step 6.1.4 have been identified, and changes to delete this step have been initiated. These procedures will be revised by October 2, 1992.
- o Other plant procedures were reviewed for steps like the one identified in this NOV, and none were identified that contained these steps.

Corrective Steps Which Will Be Taken to Avoid Further Violations

No further steps are warranted at this time other than the ones mentioned above.

Date When Full Compliance Will Be Achieved

Compliance was achieved on August 27, 1992, with the initiation of the interoffice correspondence to appropriate reactor engineering personnel.