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Georgia Power

the southern electric system

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September 5, 1984

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

File: X7BG10
Log: GN-412

Reference: 50-424/84-20, 50-425/84-20

Attention: Mr. R. C. Lewis

The Georgia Power Company wishes to submit the following information concerning the violations discussed in your inspection report 50-424/84-20 and 50-425/84-20:

Violation 50-424, 425/84-20-01, "Failure to Follow Procedures for Hanger and Structural Steel Inspections" - Severity Level V.

The violation identified discrepancies in two independent areas of inspection, pipe hanger inspections and structural steel inspections. In this response, Georgia Power Company has addressed each inspection area separately for each of the response criteria of 10 CFR 2.201.

- (1) A. Pipe hanger inspection: Georgia Power Company acknowledges the violation as identified in the NRC inspection report.
- B. Structural steel inspection: Georgia Power Company acknowledges the violation as identified in the NRC inspection report with one exception. The NRC inspector identified a maximum shear stud spacing of 14 1/4" in the inspection details section of the report. Georgia Power Company quality control personnel have made careful measurements of the shear stud spacings in question and have identified a maximum spacing of 14".

(2) The reasons for the violations are as follows:

- A. Pipe hanger inspection: Failure to identify that the bolt threads for hanger VI-1206-007-H052, Revision 1, were not upset as required is attributed to inspector error. Following the NRC inspection, a reinspection was conducted of fifteen additional previously accepted hanger installations of the type identified in the violation. No discrepancies were identified in the reinspection; therefore, Georgia Power Company considers the discrepancy identified in the violation to be an isolated case.

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B. Structural steel inspection: The acceptance of shear stud installations in violation of the spacing requirements of drawing AX2D11F001, Revision 16, and AWS D1.1-1975 is due to the misinterpretation of these requirements by quality control inspection personnel. AWS D1.1 states that shear studs may be relocated ± 1 " from the location shown on design drawings with respect to each other. Inspection personnel failed to recognize the "with respect to each other" condition of this tolerance and applied the ± 1 " tolerance to each stud. As a result, field work performed to a 12" spacing requirement was accepted for spacings ranging from 10" to 14" rather than the proper 11" to 13" spacing cited by the NRC inspector. This is considered a generic problem for structural steel shear stud installations. It should be noted that there is no indication that the number of studs installed has been affected by the spacing violations.

(3) The following corrective actions have been taken:

- A. Pipe hanger inspection: A Deviation Report has been initiated to identify and resolve the improper installation of pipe clamp bolts in hanger V1-1206-007-H052. A reinspection of fifteen additional pipe hangers was conducted to determine if a generic problem existed. No additional discrepancies were identified.
- B. Structural steel inspection: A Deviation Report has been initiated to identify and resolve the specific shear stud spacing discrepancies as identified in the NRC inspection report. A generic Deviation Report has also been generated to initiate an engineering evaluation of the adequacy of previously installed structural steel with shear stud spacing at 10" and 14". Additional corrective actions may be required depending on the results of the engineering evaluation.

(4) The following actions have been taken to prevent further violations:

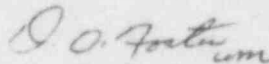
- A. Pipe hanger inspection: All quality control inspection personnel involved in pipe hanger inspections have been given written instructions to pay closer attention to hanger installations using a single nut to ensure that threads are upset as required.
- B. Structural steel inspection: All structural steel inspection personnel have been instructed in the correct interpretation of AWS D1.1 shear stud spacing tolerances. In addition, the Georgia Power Company structural steel installation and inspection procedure (CD-T-16) is being revised to specifically address the spacing tolerances of AWS D1.1-1975.

Mr. R. C. Lewis
Page Three

- (5) Corrective actions for pipe hanger and structural steel inspection discrepancies will be completed by October 8, 1984. Full compliance with applicable regulatory requirements will be achieved at that time.

This response contains no proprietary information and may be placed in the NRC Public Document Room.

Yours truly,


D. O. Foster

REF/DOF/tdm

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