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Georgia Power

THE SOUTHERN ELECTRIC SYSTEM

C. K. McCoy  
Vice President, Nuclear  
Vogtle Project

October 8, 1992

ELV-04050  
002373

Docket No. 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 50-424/92-19 and 50-425/92-19 concerning the inspection conducted by Mr. B. R. Bonser during the period of August 7-18, 1992.

Sincerely,

*C.K.M.'G*  
C. K. McCoy

CKM/K'S/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 50-424/92-19 AND 50-425/92-19

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

- "A. 10 CFR 50.54(k) requires that an operator or senior operator licensed pursuant to Part 55 of this chapter shall be present at the controls at all times during the operation of the facility.

Contrary to the above, on August 7, 1992, the licensed control room operator who had accepted operator at the controls duties for Unit 2 left the at the controls area for a brief period of time during operation of the facility.

This is a Severity Level IV violation. (Supplement 1)

- B. Technical Specification (TS) 6.7.1a requires that written procedures be established, implemented, and maintained covering activities delineated in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978.

RG 1.33, Appendix A, "Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors," paragraph 1g provides, in part, that the licensee establish and follow written administrative procedures for shift and relief turnover.

Procedure 10004-C, Shift Relief, Section 4.1, states in part, that an operator may be relieved by another qualified operator from the same shift for periods up to 30 minutes provided permission is granted by the Unit Shift Supervisor (USS).

Contrary to the above, on August 7, 1992, the operator at the controls was relieved by another qualified operator without obtaining permission of the USS.

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

RESPONSE TO VIOLATION A

Admission or Denial of the Violation

The violation occurred as stated and was reported in Licensee Event Report 50-425/1992-013.

ENCLOSURE (CONTINUED)

VOGTLE ELECTRIC GENERATING PLANT  
REPLY TO A NOTICE OF VIOLATION  
NRC INSPECTION REPORTS 50-424/92-19 AND 50-425/92-19

Reason for the Violation

The reason for this violation was a mental lapse on the part of the balance of plant (BOP) operator in that he momentarily forgot that he had relieved the reactor operator (RO) "at the controls" and could not leave his station. Prior to this event, the Unit 2 shift supervisor (USS) and the BOP operator were discussing an ongoing problem with a heating ventilation and air conditioning (HVAC) damper.

At 1058 EDT on August 7, 1992, the Unit 2 RO requested that the BOP operator relieve him at the reactor controls for a brief period. The BOP operator acknowledged receipt of this responsibility and the RO left the area. Moments later, as the USS and the BOP operator continued their discussion, the USS left the area to further investigate the damper problem on the HVAC panel behind the main control board, and the BOP operator followed him shortly thereafter. Meanwhile, the shift superintendent (SS), who had been conferring with Unit 1 personnel near the console in the middle of the control room, turned back to the Unit 2 side and saw no one at the main control board. As he walked up to the Unit 2 main control board area, the RO returned to the "at the controls" area. The period of time with no one "at the controls" was estimated to be approximately 15 seconds.

Corrective Steps Which Have Been Taken and the Results Achieved

- o The BOP operator was disciplined in accordance with the company's positive discipline program.
- o Shift briefings were conducted to inform all shifts of this event and to reinforce the "at the controls" requirement.
- o The unit superintendent held individual discussions with each RO and BOP operator in the Operations Department. These discussions emphasized the safety significance of the event and our procedural requirements regarding "at the controls" responsibility.
- o Operators have been directed to log in the unit control log when they assume the responsibility of "at the controls."
- o A copy of this violation has been placed in the Operations Department Reading Book.
- o Operations Department administrative procedures have been revised to clarify/formalize the changeover of the responsibility for "at the controls."

ENCLOSURE (CONTINUED)

VOGTLE ELECTRIC GENERATING PLANT  
REPLY TO A NOTICE OF VIOLATION  
NRC INSPECTION REPORTS 50-424/92-19 AND 50-425/92-19

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 once the SS stepped down off the podium back into the Unit 2 "at the controls" area.

RESPONSE TO VIOLATION B

Admission or Denial of the Violation

The violation occurred as stated in the N7.

Reason for the Violation

The reason for this violation was a failure to explicitly follow the procedural guidance in Procedure 10004-C, "Shift Relief."

Corrective Steps Which Have Been Taken and the Results Achieved

- o Shift briefings were conducted to inform all shifts of this event and to reinforce the "at the controls" requirement.
- o The unit superintendent held individual discussions with each RO and BOP operator in the Operations Department. These discussions emphasized the safety significance of the event and our procedural requirements regarding "at the controls" responsibility.
- o A copy of this violation has been placed in the Operations Department Reading Book.

Corrective Steps Which Will Be Taken to Avoid Further Violations

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

Date When Full Compliance Will Be Achieved

Compliance was achieved on August 26, 1992, when the unit superintendent completed the individual discussions with each RO and BOP operator in the Operations Department.