



Georgia Power

March 9, 1981

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 3100
101 Marietta Street, NW
Atlanta, Georgia 30303

REFERENCE:
RII: CEM
50-321/80-48
50-366/80-48

ATTENTION: Mr. James P. O'Reilly

Gentlemen:

The following information is submitted in response to Inspection Reports 50-321/80-48 and 50-366/80-48, concerning the inspection of December 10, 1980. Two apparent violations were identified.

VIOLATION A

10 CFR 50, Appendix B, Criterion V, as implemented by Paragraph D.9.5 of the Unit 1 FSAR and Paragraph D-4.1 of the Unit 2 PSAR, requires, that "Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished".

Contrary to the above, procedure CDT-02, which addressed placement of the backfill around the intake structure, did not contain appropriate criteria for verifying that placement and compaction of the fill materials met design requirements.

This is a Severity Level V Violation.

RESPONSE

After a review and evaluation of the available data concerning the backfill materials around the service water lines adjacent to and slightly south of the intake structure, it was disclosed that adequate documentation was not available to verify that placement and compaction of fill materials met design requirements. Therefore, it was apparent that construction specifications were violated.

Documentation did reveal numerous density tests and retests of backfill operations of all other areas around category I structures. These tests were performed at depths varying from many feet below design site grades to the general elevations of design site grades indicating extensive compaction control of backfill operations through progressive fill placement and testing.

The criteria in Georgia Power Specification Inquiry, numbers GA 3041 and 3529, were used during the early stage of construction at the time the intake backfill was performed. Procedure CDT-02, which addresses excavation and earthwork quality control, was not implemented until September 25, 1974.

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RESPONSE (Continued)

Change notices were issued against the above inquiry to perform backfill operation around the intake structure; however, the change notice did not contain appropriate criteria for verifying that placement and compaction of the fill materials meet design requirements.

Corrective Steps Which Have Been Taken And The Results Achieved In Correcting The Above-Stated Violation:

Georgia Power Company has prepared plans and specifications (DCR 80-279) detailing the method for correcting the problem.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

To prevent further occurrence HNP-6955 has been implemented to control excavation and earthwork quality control.

Date When Full Compliance Will be Achieved:

Full compliance is estimated to be achieved June 1, 1981, when DCR 80-279 will be virtually complete.

VIOLATION B

10 CFR 50, Appendix B, Criterion V, as implemented by Paragraph D.9.5 of the Unit 1 FSAR and paragraph 17.2.5 of the Unit 2 FSAR requires in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, and drawings, ... and shall be accomplished in accordance with these instructions, procedures, and drawings". Paragraph G of procedure HNP-809, "Plant Modifications Approval and Implementation" requires that changes to Design Change Requests (DCR) be reviewed and approved by the Plant Review Board (PRB) prior to being implemented. Paragraph F of procedure HNP-801, "Nonconformances", requires that a Nonconformance Report be initiated for any item of nonconformance that cannot be handled by means of existing plant procedures.

Contrary to the above:

1. Changes to the DCR for repairs of backfill under the intake structure piping were implemented prior to review and approval by the PRB.
2. Nonconformance reports were not issued to address damaged coating on the RHR and service water pipes, improperly applied protective coating to RHR and service water pipe joints, and attachment of two 2-inch lines to the 10- and 30-inch RHR and service water lines. These nonconforming conditions cannot be handled by existing plant procedure.

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Page Three
March 9, 1981

This is a Severity Level V Violation.

REPOSE

In response to statement 1, Georgia Power Company agrees that changes to the Plant Review Board (PRB) approved DCR 80-279 were implemented without PRB review and approval.

Technical Specification 6.5.1.6-d requires that the PRB shall be responsible for review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety. HNP-809 details the controls utilized to enforce requirements imposed by the Technical Specifications. The intent of HNP-809, Paragraph G.1 was that changes which alter the scope of a DCR or invalidate the existing safety evaluation for the DCR should be reviewed and approved by the PRB prior to implementation. However, HNP-809 did not explicitly differentiate between changes of scope or changes affecting safety and those not affecting safety or changing the scope of the DCR. PRB review of the change to DCR 80-279 was determined to be unnecessary because it did not alter the scope of the DCR and was approved by the AE. This resulted in the violation.

Corrective Steps which Have Been Taken And The Results Achieved:

HNP-809 has been rewritten so that the wording more explicitly reflects the intent of the procedure as discussed above.

Corrective Steps which Will Be Taken to Avoid Further Violations:

No further actions are required to be in full compliance.

Date When Full Compliance will Be Achieved:

Full compliance was achieved on March 9, 1981.

In response to statement 2, that a nonconformance report be initiated for any items of nonconformance that cannot be handled by means of existing plant procedures, it was determined prior to the inspection that one nonconformance report would be written to cover the repair activities. Due to the nature and complexity of all the repair activities and a thorough review of plant procedures, it was evident that HNP-801 was violated.

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Page Four
March 9, 1981

RESPONSE (Continued)

Corrective Steps Which Have Been Taken And The Results Achieved:

In correcting the above-stated violation, nonconformance reports have been initiated on items stated.

Corrective Steps which will Be Taken To Avoid Further Violations:

To avoid further violation, nonconformance reports will be initiated on any repair activity which is in nonconformance of documented instructions, plant procedures and drawings.

Date When Full Compliance will Be Achieved:

Actions taken to date constitute sufficient corrective action. We are presently in compliance with the specific requirements of HNP-801.

If you have any questions in this regard, please contact this office.

W. A. Widner states that he is Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that to the best of his knowledge and belief the facts set forth in this letter are true.

Georgia Power Company by: _____
W. A. Widner

Sworn to and subscribed before me this 9th day of March 1981.

Notary Public, Georgia, State at Large
My Commission Expires Sept. 20, 1983

Notary Public

REB/mb

xc: M. Manry
R. F. Rogers, III