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Georgia Power
the southern electric system

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United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
101 Marietta Street, Northwest
Atlanta, Georgia 30323

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Reference: 50-424/84-30, 50-425/84-30;
50-424/85-03, 50-425/85-03;
50-424/85-08, 50-425/85-08

Attention: Mr. Roger D. Walker

USNRC inspection report 50-424, 425/85-08, paragraph 6.b.(1)(b), identified an example of failure to properly correct design drawings and noted that the response to be developed for violation 50-424, 425/85-03-01, which identified similar discrepancies, should be expanded as necessary to consider this example. However, inspection report 85-08 was not received by the Georgia Power Company until after the response to violation 85-03-01 had been submitted to the USNRC. Therefore, the Georgia Power Company wishes to submit the following supplemental information to our response to violation 50-424, 425/85-03-01 (GN-576 dated April 4, 1985. Please note that a typographical error exists in the date on the response. A corrected copy is enclosed with this supplement.)

Paragraph 6.5.(1)(b) of inspection report 85-08 identified a failure to revise design drawing V1-1202-196-H602, Rev. 0, following field correction of a cross brace angle by the Vogtle-Structural Analysis Mobile Unit (V-SAMU). The change to the brace angle required that the connecting weld be changed from a fillet weld to a partial penetration groove weld.

The discrepancies identified in violations 85-03-01 and 84-30-01 were failures to properly incorporate Drawing Change Notices into design drawings. This discrepancy involves a misunderstanding of requirements by a V-SAMU engineer associated with in-process changes utilizing a blacklining process provided in Pullman Power Products procedure IX-50, "Pipe Support Field Installation and Fabrication Procedure." The blacklining process allows certain changes to design drawings to be made by the contractor, due to interferences or other field conditions,

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without the issuance of a Field Change Request provided concurrence is obtained from the design engineer. The concurrence of the design engineer is documented by marking the change on a field copy of the drawing, which is initialed and dated by the engineer. Pullman Power Products is then required to incorporate the change into the next revision of the design drawing mylar.

In this particular discrepancy, a V-SAMU engineer was requested to reduce a cross brace angle on pipe support V1-1202-196-H602, Rev. 0, to avoid an interference. The requested angle reduction exceeded the ±4° tolerance allowed by procedure IX-50, thus requiring a change of the previously specified fillet weld to a partial penetration groove weld. The engineer checked the calculation and determined that the angle reduction could be accomodated. A field copy of the drawing was then blacklined to show the reduced angle; however, the engineer did not mark the change of the fillet weld to a partial penetration groove weld because he interpreted the procedure as automatically requiring the partial penetration weld since the ±4° tolerance was exceeded. The NRC inspector apparently reviewed the blackline drawing and noted that the weld change was not shown.

The V-SAMU engineer prepared another blackline when the discrepancy was identified to properly show the change in weld type as well as the reduced brace angle. All of these changes were incorporated on April 18, 1985, into Revision 1 of drawing V1-1202-196-H602 which was the next revision following the field change; therefore, no violation of procedural requirements occurred.

On March 7, 1985, V-SAMU issued written instructions to their engineering personnel to ensure that, when making changes to brace angles, any required changes to connecting welds are also identified on the blackline drawing.

In conclusion, Georgia Power Company acknowledges the discrepancy which has now been corrected, but does not consider this discrepancy to be another example of violations 84-30-01 and 85-03-01 since the in-process changes were properly incorporated into the next revision of the design drawing as required by procedure IX-50.

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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