

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

On the matter of :
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 :
 GEORGIA POWER COMPANY, et al., : DOCKET NUMBERS
 : 50-424 and 50-425
 :
 (Vogtle Electric Generating :
 Plant, Units 1 and 2) :

AFFIDAVIT OF E. D. GROOVER

COUNTY OF BURKE
STATE OF GEORGIA

Before the undersigned officer duly authorized to administer oaths did appear E. D. Groover, who after being duly sworn, did state as follows:

1. My name is E. D. Groover. My business address is Vogtle Electric Generating Plant, Route 2, Waynesboro, Georgia 30830. I am employed by Georgia Power Company as Quality Assurance Site Manager (Construction). In that position I am primarily responsible for verifying the proper implementation of the VEGP site QA program from commencement of construction through pre-operational testing.

2. I make this Affidavit in support of Applicants' Motion for Summary Disposition of Joint Intervenors' Contention No. 8 (Quality Assurance). I have personal

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knowledge of the matters stated herein and believe them to be true and correct. I will first describe the Intervenor's' allegations concerning the purportedly insufficient QA manual in 1974. I will then discuss Intervenor's' allegation that inferior materials have been used on site. Finally, I will discuss the VEGP storage procedures in 1977.

INSUFFICIENCY IN THE GPC QA MANUAL IN 1984

3. The first I&E Report which Joint Intervenor's' cite in support of their challenge to the procurement practices at VEGP is I&E Report No. 74-1 issued on March 27, 1974. Three deficiencies were identified by the Atomic Energy Commission as follows:

- A-1 GPC QA Manual did not adequately describe the QA Program for design and procurement.
- A-2 The GPC Quality Assurance audit planning did not include adequate disability, in that the application of all applicable QA criteria was not clear for design and procurement.
- A-3 The Southern Services, Inc. (SSI) QA Manual did not reflect the requirements of the current PSAR, Section 17.

4. The deficiencies and the details of these deficiencies are set forth in I&E Report No. 74-1. None of the deficiencies involved problems which adversely affected the quality at VEGP.

5. These deficiencies were found by the AEC before a construction permit was issued with regard to Plant Vogtle

and at a time before safety-related work had been performed.

6. At that time, GPC's Quality Assurance responsibilities relative to design and procurement were being handled by Southern Company Services, its sister engineering service organization. SCS was administering a contract with Bechtel Power Corporation, the architect-engineer. Therefore, at the time, the QA audit program description and the QA manual was a Southern Company Services document.

7. Southern Company Services Quality Assurance organization performed work on a number of other projects. Their quality assurance audit program description was general and contained few specific details unique to the Vogtle Project.

8. In response to the AEC's identified deficiencies, GPC proposed as corrective action to completely rewrite the VEGP QA Manual. The rewritten manual was composed of eighteen sections corresponding with the arrangement of 10 C.F.R., Part 50, Appendix B and showing the requirements for implementation of those criteria. The new QA Manual also had a text with accompanying diagram and organizational charts which fully described organizational/functional alignment, responsibilities and authorities and activities of the QA program. The contractor QA programs and their interfaces with GPC were

clearly outlined by appropriate text and references. Reference of supporting documents and implementing procedures was utilized to indicate how the QA requirements were satisfied and to insure that the manual was self-supporting. The QA manual, which resulted from this corrective action, is essentially the same as that which has governed all safety-related work at VEGP since it was adopted in response to I&E Report No. 74-1. No safety-related work was done under the allegedly deficient QA manual.

9. The AEC accepted Georgia Power Company's proposed corrective action and closed these deficiencies in an I&E Report issued on October 9, 1974.

10. There is nothing in this incident which suggests a compromise of the safety of the construction or procurement practices at Plant Vogtle. Simply stated, this incident does not support Joint Intervenors' challenge to the procurement practices at VEGP.

ALLEGATION THAT INFERIOR MATERIALS
HAVE BEEN USED ON SITE

11. To the extent this allegation may relate to some "spools which were checked," GPC had a re-inspection of approximately 15,000 piping spool pieces that had been fabricated by Pullman Power Products. The re-inspection was needed to ascertain the acceptability of fabrication welds after code rejectable deficiencies had been found in a sampling of spool pieces stored at the Plant site. The

re-inspection program resulted in the satisfactory resolution of this situation. No inadequate spools were used.

STORAGE PROCEDURES IN 1977

12. Intervenors refer to a statement made by an NRC inspector in I&E Report No. 77-3 that, at the time, "a QA program is not in operation at Vogtle," sufficient to receive safety-related equipment.

13. This incident came about when safety-related equipment (including spray nozzles for containment spray systems, 44 Fisher control valves and 7 elbows for reactant cooler piping) were received at VEGP in early 1977 before VEGP was prepared to receive or properly store such safety-related equipment.

14. At the time, Georgia Power Company believed that there was not sufficient activity on site of a quality nature to justify the presence of full-time Quality Assurance personnel. Mr. Cecil R. Miles and myself periodically visited Plant Vogtle from Plant Hatch (GPC's Nuclear Facility near Baxley, Georgia) to conduct audits as necessary. The safety equipment which was received and which was subject to I&E Report No. 77-3 arrived at VEGP between these periodic audits. It was not expected that safety-related equipment would be received on site at that time. Accordingly, when the NRC inspection occurred between June 6 and June 9, 1977, there were no procedures governing the receipt and storage of this equipment.

Moreover, full-time inspection audits had not been planned. Thus, a noncompliance was found by the NRC.

15. On July 19, 1977, Georgia Power Company responded to this noncompliance with corrective action. Georgia Power Company notified Westinghouse and other vendors that permanent warehousing facilities were not available at the site at that time. Westinghouse was informed that the site would not receive safety-related equipment or equipment which required greater than Level "D" storage as specified in the Westinghouse storage procedures.

16. Also, a tentative Quality Assurance audit schedule was prepared, and I, as Senior Quality Assurance Field Representative, was transferred to permanent assignment at VEGP from Plant Hatch. Receipt, inspection and storage procedures were written and approved, and a mechanical inspector was permanently assigned to the site. The procedures for material control and handling which were written in 1977 are substantially the same as those which have been used since that time to govern purchase of all safety-related materials and equipment at VEGP.

17. In response to this corrective action, the NRC closed this noncompliance on November 18, 1977. The inspector determined that the licensee had provided a program which corrected the noncompliance previously identified. There was no adverse effect upon the quality

of the equipment which was improperly stored and which was identified in I&E Report No. 77-3. The quality of all future material and equipment stored at VEGP was assured by the Quality Assurance Program.

Further Affiant sayeth not.

E. D. Groover
E. D. GROOVER

Sworn to and subscribed before me
this 21st day of June, 1985.

Mary K. Hume
Notary Public

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NUCLEAR REGULATORY COMMISSION

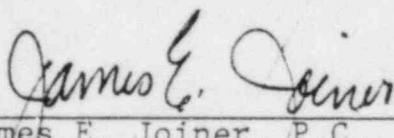
Before the Atomic Safety and Licensing Board

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GEORGIA POWER COMPANY,)	DOCKET NOS. 50-424
ET AL.,)	and 50-425
(Vogtle Electric Generating)	
Plant, Units 1 and 2))	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Attachments 1 - 10 (Affidavits) Submitted in Support of Applicants' Motion for Summary Disposition of Joint Intervenors' Contention No. 8" dated June 24, 1985, were served upon those persons on the attached Service List by depositing a copy of same in the United States Mail, postage prepaid, or where indicated by an asterisk(*) by hand delivery, this 24th day of June, 1985.

Respectfully submitted,



James E. Joiner, P.C.
Counsel for Applicants

DATED: June 24, 1985

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) 50-425
(Vogtle Electric Generating Plant,)
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