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February 26, 1985

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

Attention: Mr. John A. Olshinski

Georgia Power Company wishes to submit the following additional information in response to Mr. James P. O'Reilly's letter to Mr. R. J. Kelly dated January 28, 1985, and further to our response (GN-500, dated 12/27/85) to USNRC Inspection Report 50-424, 425/84-30.

The USNRC's January 28, 1985, letter stated, "a 'verbal hold' is neither adequate to satisfy the requirements of 10 CFR 50 Appendix B, Criterion XV, nor permissible under the Pullman Power Products Procedure [XV-4] involved." We agree with this statement and, in retrospect, we feel that "verbal hold" was an inappropriate term to use in describing the Pullman Power Products QC inspector's actions at the time the crack indication was discovered.

The crack indication was reported to Pullman Power Products QC by craftsmen working on the pipe racks during the "B" shift of October 31, 1984. Since it was late in the shift, the QC inspector informed the craftsmen that the indication could not be evaluated before the shift ended and that they should leave the weld alone and the evaluation would be completed on the next shift. This was the "verbal hold" mentioned in our earlier response and was not intended to fulfill any QA program requirements for the control of nonconforming items.

Pullman Power Products Procedure XV-4 for the application of hold tags allows QC inspectors to use their own judgement as to whether a hold tag is required to prevent further processing of an item being evaluated for significance. In the case cited, the inspector determined that a hold tag was not necessary during the time of the evaluation because the P119 to P120 weld in the pipe rack R0001 was a completed weld, and no further processing was forthcoming on the weld until the evaluation was completed. However, since the evaluation could not be completed before the shift ended, a hold tag should have been placed on the weld to ensure identification and control of the weld until the next shift could complete the evaluation.

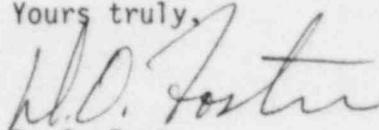
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When the QC evaluation was completed, approximately eight hours from the time QC was notified of the crack indication, a Deviation Report was issued and a hold tag was placed adjacent to the weld. To prevent recurrence of discrepancies of this type, Pullman Power Products Procedure XV-4 will be revised to clarify the use of hold tags relative to evaluation work carried from one shift to another. Personnel affected by the procedure change will be indoctrinated to the new requirements. Georgia Power Company expects to complete these corrective actions by April 15, 1985.

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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