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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: 50-424/85-23 and 50-425/85-23

Attention: Mr. Roger D. Walker

The Georgia Power Company wishes to submit the following information concerning the violation identified in your inspection report 50-424/85-23 and 50-425/85-23.

The violation identified a failure to install pressure taps in accordance with the Final Safety Analysis Report (FSAR) and the piping and instrumentation drawing (P&ID). Georgia Power Company offers the following response pursuant to the criteria of 10 CFR 2.201:

1. Georgia Power Company acknowledges the violation to the extent noted below.
2. The HVAC filter unit vendor drawings were reviewed and it was determined that the design intent was met. However, the design engineer failed to follow through and update the P&ID to show the different locations for the pressure taps.

The incorrect installation of the instruments is attributable to craft error and failure to have an adequate installation verification mechanism in place.

3. Drawing Change Notices (DCN's) have been initiated against P&ID's AX4DB-206-1 and 3 (Units 1 and 2) to bring the P&ID's into agreement with the vendor design drawings with respect to the location of gauges PDI-12137B and D, and FSAR Figure 9.4.1-2 (sheets 1 and 3 of 3) will be revised accordingly. It will not be necessary to revise FSAR table 6.4.6-1, since the table calls for differential pressure to be measured across the total filter unit without specifically noting the cooling coils and the cooling coils do not provide a filtration function.

Exception is taken to the alleged discrepancy of low pressure taps located inside the HEPA filter rack support assembly area not being in accordance with the P&ID depicted location downstream of the

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filter assembly. The P&ID is a schematic drawing intended to show general location and function but not exact location of items. The pressure tap locations on the P&ID are intended to show measurement of pressure drop across the HEPA filters. The physical location of the pressure taps does provide pressure drop measurement across the HEPA filters. Associated with this the low pressure instrument is not a pitot tube but is a static pressure sensor of a type not adversely affected by any eddy currents that might exist around the HEPA filter rack assemblies.

To determine the extent of incorrect static pressure sensor installations, the orientation of all previous installations will be checked and all discrepancies found will be documented and corrected.

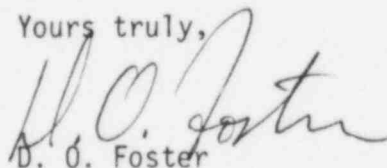
4. The HVAC P&ID's were reviewed for accuracy and to determine the extent of pressure instrumentation location discrepancies. No other discrepancies were found and no additional action to prevent recurrence is deemed necessary.

To prevent recurrence of incorrect static pressure sensor installations, the appropriate craftsmen will be re-trained to the correct installation requirements. Effective immediately a note will be added to the craftsmen's work package emphasizing the correct installation. A mark will be applied to the external (visible) part of the instrument to facilitate verification of proper installation. Verification by craft supervision of proper installation will be made at the time of installation and as a part of the final engineering walkdown prior to turnover.

5. All corrective actions relative to this violation are expected to be completed by September 13, 1985.

This response contains no proprietary information and may be placed in the NRC Public Document Room.

Yours truly,



D. O. Foster

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