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Georgia Power

the southern electric system

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April 7, 1988

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
PLANT VOGTLE - UNITS 1, 2
NRC DOCKETS 50-424, 50-425
OPERATING LICENSE NPF-68
CONSTRUCTION PERMIT CPPR-109
TACS 65955/65956
RESPONSE TO NRC BULLETIN 88-01
"DEFECTS IN WESTINGHOUSE CIRCUIT BREAKERS"

Gentlemen:

The subject NRC Bulletin, dated February 5, 1988, requested that Georgia Power Company submit a letter of confirmation for completion of inspections for certain Westinghouse circuit breakers. The Georgia Power Company response is provided in the enclosure to this letter. If you have any questions in this regard, please contact this office.

Mr. L. T. Gucwa states that he 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.

Sincerely,

L. T. Gucwa

Sworn to and subscribed before me this
7th day of April, 1988.

Notary Public

Notary Public, Clayton County, Ga.
My Commission Expires Dec. 12, 1989

MJB/ju

Enclosure: Response to NRC Bulletin 88-01

c: (see next page)

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c: Georgia Power Company

Mr. J. T. Beckham, Jr., Vice President - Plant Hatch
Mr. P. D. Rice, Vice President and Vogtle Project Director
Mr. G. Bockhold, Jr., General Manager - Plant Vogtle
GO-NORMS

U. S. Nuclear Regulatory Commission, Washington, D. C.

Mr. L. P. Crocker, Licensing Project Manager - Hatch
Mr. J. B. Hopkins, Licensing Project Manager - Vogtle (2 copies)

U. S. Nuclear Regulatory Commission, Region II

Dr. J. N. Grace, Regional Administrator
Mr. P. Holmes-Ray, Senior Resident Inspector - Hatch
Mr. J. F. Rogge, Senior Resident Inspector, Operations - Vogtle
Mr. R. J. Schepen, Senior Resident Inspector, Construction - Vogtle

ENCLOSURE

PLANT HATCH - UNITS 1, 2
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RESPONSE TO NRC BULLETIN 88-01
"DEFECTS IN WESTINGHOUSE CIRCUIT BREAKERS"

In this enclosure, Georgia Power Company (GPC) presents its response to NRC Bulletin 88-01, "Defects in Westinghouse Circuit Breakers", for Plants Hatch and Vogtle. The Bulletin requires a determination of the number and Class 1E use of five specific breaker models (Westinghouse DS-206, DSL-206, DS-416, DSL-416, and DS-420). If the breakers are found, the Bulletin requires short and long term inspection and reporting of the inspection results. If none of the referenced breakers are found, then the Bulletin requires an affidavit to that fact. It is our understanding that subject replacement breakers or parts from Westinghouse require a certificate of compliance with this Bulletin.

PLANT HATCH

There are no Westinghouse model DS-206, DSL-206, DS-416, DSL-416, or DS-420 breakers in Class 1E circuits at Plant Hatch. This completes the requirements for the subject Bulletin for Plant Hatch.

PLANT VOGTLE UNIT 1

There are eight of the subject breakers in the following uses at Plant Vogtle Unit 1: two Reactor Trip Breakers (RTBs), two Reactor Trip Bypass Breakers, two Motor-Generator Ground Control Circuits (non-1E application), and two spares. All of these breakers are model DS-416. The subsequent discussion for this unit will refer only to the six Class 1E breakers. These breakers were examined under the criteria of the Westinghouse September 11, 1987 Service Advisory Letter (SAL) on October 16, 1987, during a maintenance outage. The SAL criteria had been incorporated into Maintenance Procedure 27765-C, Rev 9, "Westinghouse Type DS 416 Circuit Breaker Maintenance". The inspection results are maintained for the installed Class 1E breakers only. At the time of the SAL inspections, there was no observed mechanical misalignment. However, one of the main pole shafts (RTB "B") failed the inspection and was removed from service. Although RTB "B" passed the acceptance criteria of the SAL, it was rejected by GPC based on a lack of fusion across the weld fillet near the center of its length. It is believed that this pole shaft would not have passed the criteria of the Bulletin. Upon rejection, the entire breaker was replaced with an inspected Class 1E spare and Westinghouse was contacted to obtain a replacement shaft. The replacement was received in January 1988.

ENCLOSURE (continued)

"DEFECTS IN WESTINGHOUSE CIRCUIT BREAKERS"

The SAL was incorporated verbatim into Westinghouse Technical Bulletin NSID-TB-87-11. The Westinghouse Technical Bulletin was in turn embodied into the NRC Bulletin 88-01. While evaluating the SAL inspections against the requirements of the NRC Bulletin, it became apparent that the additional weld inspection criterion for porosity imposed by Bulletin 88-01 mandated reinspection of the main pole shafts. Although porosity/surface indications are an inherent part of visual weld inspections, the specific criterion was not reflected in Procedure 27765-C, Rev. 9, and was, therefore, not previously documented. Procedure 27765-C has been revised to include the NRC Bulletin's visual weld inspection acceptance criterion. The short and long term inspections in accordance with Bulletin 88-01 were combined and conducted March 5 through March 10, 1988, for Class 1E breakers while the unit was at 100% power.

One pole shaft (Bypass "B") failed the inspection for excessive porosity in terms of the NRC Bulletin's requirements. The breaker was removed from service. There were no mechanical misalignments. The failure of the pole shaft on Bypass "B" was not detected on the previous inspection because of the lack of a specific porosity criterion. A replacement is on order from Westinghouse. When it is received, the breaker will be inspected and retained as a spare. These actions complete the requirements of the subject Bulletin for Plant Vogtle Unit 1.

PLANT VOGTLE UNIT 2

There are six of the subject breakers in the following uses at Plant Vogtle Unit 2: two RTBs, two Reactor Trip Bypass Breakers, and two Motor-Generator Ground Control Circuits (non-1E application). All of these breakers are model DS-416. The subject inspections will be completed for the four Class 1E applications prior to fuel load (expected in early 1989). The inspection results are expected to be forwarded to the NRC within 30 days of completion.

ADDITIONAL INFORMATION

The NRC requested additional information to evaluate the cost of complying with Bulletin 88-01 in the following areas:

- (1) "staff time to perform requested inspections, corrective actions, and associated operability testing:"

During an inspection performed in October 1987, Plant Vogtle personnel expended approximately 148 manhours among Maintenance, Engineering, Quality Control, and Operations. This does not include the time of the NRC or Westinghouse personnel who also witnessed the inspections.

ENCLOSURE (continued)

"DEFECTS IN WESTINGHOUSE CIRCUIT BREAKERS"

During the inspection in March 1988, Plant Vogtle personnel expended approximately 171 manhours among Maintenance, Engineering, Quality Control, Operations, and Nuclear Safety and Compliance. This does not include the time to replace the pole shaft.

No significant costs were incurred for Plant Hatch.

(2) "staff time to prepare requested documentation":

A total of 80 manhours has been expended in preparing the requested documentation. This time is divided among Plants Vogtle and Hatch Nuclear Safety and Compliance groups and the corporate office Engineering and Nuclear Safety and Licensing groups.

(3) "additional cost incurred as a result of the inspection findings (e.g., costs of corrective actions, costs of downtime)":

There is no easy determination of inspection cost for the October inspections.

For the March inspections, there was no "downtime" cost as the inspections were performed at power.

The replacement pole shafts are being provided to GPC at no charge by Westinghouse.

No significant costs were incurred for Plant Hatch.