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February 15, 1988

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

PLANT VOGTLE - UNIT 1
NRC DOCKET 50-424
OPERATING LICENSE NPF-68
RESPONSE TO SYSTEMATIC ASSESSMENT OF
LICENSEE PERFORMANCE

Gentlemen:

Georgia Power Company (GPC) has reviewed the information presented in the Systematic Assessment of Licensee Performance (SALP) Report transmitted by your letter dated January 11, 1988, and at the meeting held between GPC and the NRC at the Plant Vogtle site on January 19, 1988.

We appreciate the constructive comments made in the SALP evaluation, as well as your recognition of GPC's efforts and successes in improving our performance. GPC also appreciates the NRC's explanation of the SALP Board's evaluation and the NRC's comments at the SALP meeting regarding the ability of GPC personnel to recognize, evaluate and correct operational problems.

GPC is fully committed to safe and efficient operation of its nuclear plants. We take the SALP Board recommendations seriously and will use this information in the continuing process of improving our performance.

GPC has placed major emphasis on improving plant operations and security. We recognized problems in these areas during the SALP period and implemented a number of corrective action programs. Those improvement programs have been thoroughly discussed with the NRC staff. These efforts will continue until GPC is assured that they have achieved and maintained high levels of performance.

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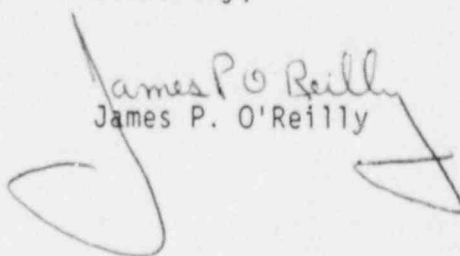
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The GPC responses to the NRC SALP findings in each functional area are contained in the enclosure to this letter. The initiatives identified in our responses will be actively pursued in our continuing effort to improve overall plant performance, particularly in the areas of plant operations and security.

Should you have any questions regarding this letter or Plant Vogtle activities, I will be pleased to discuss them with you.

Sincerely,


James P. O'Reilly

JPO:ju

Enclosure: Response to SALP Report

c: (see next page)

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c: Georgia Power Company

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U. S. Nuclear Regulatory Commission

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Mr. J. B. Hopkins, Licensing Project Manager, NRR (2 copies)
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ENCLOSURE

PLANT VOGTLE - UNIT 1
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RESPONSE TO SYSTEMATIC ASSESSMENT
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PLANT OPERATIONS:

GPC is aware that problems existed in the area of plant operations during the first half of 1987 during initial operations and startup testing. Strong management action was taken to effectively identify root causes and to correct problems. While instantaneous recovery was not accomplished, better implementation of improved programs has produced, over a few months, greatly improved conditions. These actions are serving as a sound foundation for long-term, superior plant operations performance. Some of the actions taken by GPC to improve plant operations are described below.

1. Organizational Changes

Several organizational enhancements were made to assist in the improved implementation of operations programs. These enhancements are associated with: the rotation of several managers to broaden experience and technical expertise, the reassignment of some managers, and the creation of new management positions. Some of the positions affected by these organizational improvements included the Plant Manager, Plant Support Manager, Chemistry and Health Physics Manager, Security Manager, Deputy Operations Manager, and Technical Assistants to the General Manager and Plant Manager.

In addition, plant management was authorized to augment the plant staff as necessary to assure that GPC goals were achieved. Specific areas targeted for improvement, and where improvements have been made, include the reduction of outstanding maintenance work orders, improved problem identification and resolution, and problem prevention. Also, the use of vendors with special nuclear expertise was increased to facilitate lessons learned at other nuclear facilities.

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In concert with the actions outlined above, the corporate office developed a regulatory sensitivity training class which has been presented to key managers and staff to make them more aware of the need to understand and pay closer attention to the relationship between regulations and nuclear safety. This program, our "commitment to safety" was designed to provide higher assurance on complying with the safety intent of regulations.

2. Special Teams or Committees

A Trip Reduction Committee was established to oversee the Trip Reduction Program. The key elements of the Trip Reduction Program are the post-trip review team, industry experience reviews and failure analyses. The Independent Safety Engineering Group was instrumental in developing and integrating the various elements into the overall program which includes comprehensive root cause evaluations.

A Special Startup Detail, in addition to the normal crew, was created to ensure that the most experienced operators, engineers, and managers are used during plant startups. These experts are assigned to supplement positions in the shift organization such as: reviewing critical data, ensuring correctness of estimated critical rod position calculations, checking valve position alignments, and being available to respond to the needs of the operating staff as mechanical, electrical, or instrumentation and control issues arise. This special detail is stationed prior to reactor startup and remains on watch through completion of critical evolutions such as the transition to main feedwater system operation and in the initial loading of the turbine generator.

A Trip Response Team was also established to evaluate each trip in an organized and structured fashion. The team is generally composed of the Plant Manager or his designee; the Engineering Superintendent; and representatives from Operations, Nuclear Safety and Compliance, Independent Safety Engineering Group, and, as appropriate, Quality Assurance, and representatives from Nuclear Steam Supply System and Architect Engineer. As a part of the post trip evaluation, the root cause of the event leading to the trip is determined. The root cause determination process is based on a number of management techniques most appropriate for the situation, including the Management Oversight and Risk Tree approach, Kepner Tregoe methods, and Casual Factors Charting. A determination relative to The Human Performance Evaluation System is also included.

ENCLOSURE (Continued)

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An Operations Management Council has recently been established to oversee and evaluate operational activities including the work performed by the Plant Review Board.

3. Other Controls and Programs

Biweekly operational meetings were initiated to improve communications and staff integration. These meetings allowed the Sr. Vice President, and the senior corporate managers, to meet with the plant General Manager and his senior technical staff to review current problems and plans for resolution.

In mid-1987 two important programs were initiated to achieve greater benefit from lessons learned from nuclear plant events. The Industry Events Analysis and Resolution Program, and the Plant Events Analysis and Resolution Program were developed. Each pulls together the various aspects of event analysis, including applicable procedures, and provides overall company guidance.

A third program, the Positive Valve and Breaker Control Program, was initiated to establish control to ensure that plant valves and breakers are in, and remain in their proper position. A multi-disciplined review team was used to develop and implement the program. The objectives were: (1) review Plant Vogtle events in which mispositioned valves or breakers played a significant role, (2) determine the root causes of the valve or breaker mispositioning, and (3) provide detailed recommendations to achieve improved controls. The review assisted plant management in formulating corrective actions to reduce the likelihood of future valve and breaker mispositioning.

The theme of teamwork was integrated into all programs. As an example, a larger and more aggressive plan of the day meeting is now held every work day with working level personnel from Maintenance, Operations, Engineering, Scheduling, and Health Physics and Chemistry Departments to discuss and plan the next day's work activities. This allows for smooth integration of all work activities and higher completion rates for scheduled work functions. Also, engineering personnel were required to become more involved in plant trip evaluations and recoveries through mandatory participation on Trip Response Teams. Also, key personnel from cognizant departments participated in the Trip Reduction Program.

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RADIOLOGICAL CONTROLS

While GPC does not take issue with the SALP Board's evaluation of Health Physics and Chemistry activities, some of the comments made do not seem appropriate or in balance. The HP programs, did suffer from staffing questions, but established goals for personnel exposure, contamination events, contaminated areas and volume of radioactive waste generated were achieved. The staffing issue has been addressed and Plant Vogtle is near completing the filling of 34 new positions. The SALP report also addressed NRC concerns regarding the Biological Shield Survey adequacy, the qualification and experience of those staff members conducting the survey, and the use of NSSS vendor experience in such surveys. We wish to note that this item is not fully resolved. This subject has been discussed several times with Region II staff and Region supervision and several interface issues have been raised and resolved. GPC still maintains that the startup survey was complete and acceptable and that we met NRC requirements.

In summary, Vogtle experienced problems in the Chemistry and Health Physics areas during startup and initial operation. GPC took prompt action to address the root causes of these problems, including assignment of the corporate Radiological Safety Manager to the plant staff. We believe our current performance will warrant an improved rating during this current SALP period.

MAINTENANCE

GPC appreciates the recognition of our maintenance activities by the NRC SALP Board as indicated by the Category 1 rating. The Board's analysis of the maintenance area will be carefully evaluated. While we believe the few identified weaknesses have been corrected, a thorough reassessment will be made with special attention to your recommendation regarding the prioritizing of open maintenance work orders for items related to safety.

SURVEILLANCE

The NRC Plant Vogtle SALP Board found that, in general, surveillance testing was conducted by personnel who were knowledgeable of the system and/or component being tested and that tests were performed without incident. However, some weaknesses were identified dealing primarily with the compatibility of some surveillance procedures and the corresponding Technical Specification requirements. As noted in the SALP report, effective corrective action was taken to resolve identified deficiencies and GPC management and Quality Assurance Group involvement was prompt in addressing surveillance related problems.

ENCLOSURE (Continued)

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GPC recognizes the importance of regular testing of plant equipment that is maintained in a standby mode to provide maximum assurance of operations in the event it is called upon to perform its design function. Corporate and plant personnel will continue to work together to improve surveillance testing activities.

FIRE PROTECTION

The SALP Report listed two Severity Level IV violations that were cited by the NRC during the SALP evaluation period. Violation "b" was downgraded to a Severity Level V as documented in an NRC letter from Mr. Reyes to Mr. O'Reilly dated April 1, 1987. Corrective actions and actions to prevent recurrence were taken as outlined in the GPC response to Inspection Report 50-424/87-02. The importance of the fire protection system is fully understood by GPC. We recognize that certain aspects of fire protection have been identified that need to be improved. The appropriate level of attention is being given to these conditions and that level of attention will continue.

EMERGENCY PREPAREDNESS

The SALP Board assigned a rating of Category 1 for emergency preparedness for the second consecutive period. This rating recognized a strong program that has been effectively implemented. GPC appreciates this NRC recognition of good performance by dedicated personnel functioning as a team. GPC will strive to maintain the high standard demonstrated in this functional area.

SECURITY

The SALP Board rating for security at Plant Vogtle stated that serious problems existed during the early part of the SALP evaluation period. GPC agrees with the assessment. GPC management realizes that they may not have been as prompt as they should have been in recognizing the seriousness of security deficiencies. While the NRC identified a pattern of weaknesses during preliminary plant operations, we wish to note that no actual security hazard occurred as a result of those weaknesses.

Inadequate management attention to the security program was the major contributor to each of the identified problems. This was attributed primarily to an initial lack of nuclear management experience in the security area. The inexperience factor was amplified by management's failure to include physical security preparedness in our Readiness Review program for Plant Vogtle Unit 1. To help preclude similar problems from recurring at Plant Vogtle Unit 2, physical security was made a significant part of the readiness review program for Unit 2.

ENCLOSURE (Continued)

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With the issuance of the operating license in January 1987, the need for full operational capability of the Vogtle Security Department personnel and security related equipment was immediate. In regard to equipment, deficiencies either unidentified or underestimated became clearly apparent. In order to increase the reliability of this equipment, GPC initiated a task force of vendors, engineers, and security specialists to address problems. With regard to Security Department personnel, security force members experienced in construction security were immediately exposed to the rigors and details required in an operating nuclear facility. Due to management's failure to fully recognize problems in training, testing, and procedure adherence; security personnel performance was not up to acceptable levels. This personnel problem was more difficult to address than the hardware problem. However, the following actions were successfully taken:

1. The entire security training staff was replaced with nuclear-experienced personnel, and responsibility for security training was moved from site training control to security control;
2. Security procedure training was enhanced;
3. Approximately 20 management, supervisory, response, and training personnel experienced at operating nuclear plants were hired for the security staff;
4. Forty new GPC nuclear security officers were recruited, hired and trained;
5. Absenteeism rules were consistently applied and enforced; and
6. Corporate and site management, including senior executive management, held discussions with the entire security force and received and resolved concerns.

Security administration also did not meet our standards. The following actions were taken to correct this problem.

1. A corporate nuclear security coordinator, whose primary expertise is in administration, was assigned to Plant Vogtle to implement enhanced administrative processes, and to get the existing ones on track and working properly;
2. An administrative specialist was assigned to each shift to coordinate the preparation of reports and records; and

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3. Administrative procedures were strengthened to assure that records and reports were being properly handled.

GPC is fully committed to compliance with all NRC requirements. It is expected that the level of performance in the area of security will continue to improve during the current SALP period.

QUALITY PROGRAMS AND ADMINISTRATIVE CONTROLS
AFFECTING QUALITY

GPC appreciates SALP Board comments in the area of Quality Programs. We will carefully evaluate your recommendation to determine how best to provide increased management support to ensure that QA audit findings are promptly and properly resolved. GPC takes quality assurance seriously. We are fully committed to achieving the highest level of performance and have developed management supported programs to assure both quality performance and timely, effective corrective action in response to quality assurance findings.

LICENSING ACTIVITIES

The SALP Board noted a number of strengths and weaknesses associated with licensing activities. GPC appreciates NRC recognition of some of our good performance as well as constructive criticism in other areas. We are in general agreement with your assessment, but we wish to clarify a few of your observations in the interest of better communications. This is important in that GPC places high priority on responsiveness to NRC recommendations.

With regard to your reference to inadequate GPC management involvement relative to corporate and site organizations, GPC acknowledges that several revisions to the FSAR concerning corporate and site organizations were made close to Unit 1 licensing. The issue is timing of the organizational changes. These revisions, in part reflected an expansion of the corporate organization in preparation for Vogtle operation. Nuclear Operations general office staffing increased approximately 40% during the SALP rating period. The organization changes were intended to assure the highest level of competence in the management and technical support of Plants Vogtle and Hatch. GPC regrets the additional review burden placed on the Staff by these revisions. We strongly believe that the net affect of the changes is an enhancement of plant safety. While the FSAR revisions did contain some errors, they were few in number, were minor, and were promptly corrected.

Regarding insufficient management involvement in the design of the spent fuel racks referenced on page 33, we do believe that the information

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submitted by GPC complied with the applicable NRC guidance and addressed NRC requirements and concerns known to GPC at the time of submittal. The information was prepared by licensing personnel experienced in the licensing of spent fuel racks having participated in the licensing of the spent fuel racks at Plants Farley and Hatch. The information was submitted well in advance of the date for which approval was needed. The NRC questions on seismic design of the racks represented new issues apparently resulting from the Diablo Canyon review. GPC promptly addressed all questions received. Only minor revisions to the initially submitted information were necessary as a result of NRC questions.

With regard to the delayed submittal in response to a staff request associated with the Fuel Handling Building Post-accident Ventilation Actuation System referenced on pages 34 and 35, the discrepancy in the Technical Specifications noted by the staff did not represent an immediate safety concern; and the revision was not requested by a specific date. GPC, therefore, did not place the highest priority on processing the revision. In fact, the revision was held for some time so that it could be incorporated into another Technical Specification change request. GPC makes every effort to meet submittal deadlines; however, we were not informed of any urgency associated with this issue and no deadline was set.

TRAINING AND QUALIFICATION EFFECTIVENESS

GPC appreciates the SALP Board's recognition of our high level of performance in the area of Training and Qualification Effectiveness as indicated by a Category 1 rating. This performance level was attained through dedication and a concerted effort of all individuals involved with the training program plus a strong management commitment of resources and staffing. The Category 1 rating is a source of great pride and we are confident that the same level of effort will continue in the future.

PREOPERATIONAL TESTING

GPC recognizes that some documentation weaknesses associated with preoperational testing existed during the later part of the preoperational test program. However, we are disappointed that the SALP Board or NRC in general perceived those conditions and GPC actions to be unresponsive to NRC concerns. GPC may not always agree with NRC findings, but we diligently strive to be responsive to concerns in a timely manner. Some preoperational tests were delayed because of the difficulty associated with performance of the tests without nuclear heat. We also wish to note that the preoperational test staff exercised considerable restraint to schedule pressure particularity during the ESFAS testing, always assuring that safety and quality were given first priority. Weaknesses and difficulties identified during Unit 1 testing will be evaluated and the lessons learned will be used to improve the preoperational testing program for Unit 2.

ENCLOSURE (Continued)

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STARTUP TESTING

GPC agrees with the SALP Board rating in this functional area. The NRC analysis is appreciated. The frequency of reactor trips is addressed in the operations section of this enclosure. The problems encountered during startup testing were quite visible to top management and received top level management attention. Several important lessons were learned that will contribute to a more efficient startup test program for Vogtle Unit 2.