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the southern electric system

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March 10, 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
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

In accordance with the provisions of 10 CFR 2.201, Georgia Power Company (GPC) submits the enclosed information in response to NRC Inspection Report 50-424/88-05 which concerns the inspection conducted by Mr. G. A. Hallstrom of the NRC Region II staff on January 11-15, 1988. A copy of this response is being provided to the NRC Region II office for review.

In the enclosure, transcription of the NRC violation precedes GPC's response.

Should you have any questions in this regard, please contact this office at any time.

Sincerely,

L. T. Gucwa

JAE/lm

Enclosure:

1. Violation 88-05-02 and GPC Response

c: (see next page)

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c: Georgia Power Company
Mr. P. D. Rice
Mr. G. Bockhold, Jr.
GO-NORMS

U. S. Nuclear Regulatory Commission
Dr. J. N. Grace, Regional Administrator
Mr. J. B. Hopkins, Licensing Project Manager, NRR (2 copies)
Mr. J. F. Rogge, Senior Resident Inspector-Operations, Vogtle

ENCLOSURE

PLANT VOGTLE -- UNIT 1
NRC DOCKET 50-424
OPERATING LICENSE NPF-68
NRC NOTICE OF VIOLATION 88-05-02 AND GPC RESPONSE

VIOLATION 50-424/88-05-02

"Vogtle Electric Generating Plant, Unit 1 Technical Specifications, Section 6.7.1.a. requires that written procedures covering Quality Assurance Program requirements be established, implemented, and maintained.

Georgia Power Company (GPC) Procedure 25340-C, Revision 0, Section 3.3.3 requires that welding filler material be procured so that 18 inch length bare rod shall be flag tagged one end, showing material classification and a heat and/or lot number or a control marking code, which identifies the material with the Certified Material Test Report.

GPC Procedure 25330-C, Revision 5, Section 6.4 requires that welding filler material be controlled so that bare welding rods, bare electrodes, and consumable insert rings will be stored separately by AWS classification and need not be stored in heated ovens. They will be identified by heat, lot and/or control number.

Contrary to the above, on January 14, 1988, activities were not accomplished in accordance with the above in that operations maintenance toolroom personnel were applying flag tags to bare 18" length welding rods based on verbal instructions and without any positive verification of their associated heat, lot and/or control number.

This is a Severity Level IV violation (Supplement II) Unit 1 only."

RESPONSE TO VIOLATION 50-424/88-05-02

Admission or denial of alleged violation:

The violation occurred as stated.

Reason for the violation:

The weld rods in question were requisitioned directly from the Construction Warehouse prior to the issuance of Procedure 25340-C, Rev. 0, "Procurement of Welding Filler Materials", on August 25, 1986. Subsequent to the issuance of Procedure 25340-C there was a failure to ensure that the weld rods in stock (in the Maintenance Toolroom) complied with that procedure.

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ENCLOSURE (Continued)

NRC NOTICE OF VIOLATION 88-05-02 AND GPC RESPONSE

An additional underlying reason for the violation was the apparent failure to follow Procedure 20006-C, "Obtaining Material From Nuclear Construction Warehouse", at the time of the weld rod requisition from the Construction Warehouse on October 2, 1985. Nuclear Operations Quality Control (QC) was not notified to perform a routine inspection in accordance with Procedure 00850-C, "Material Receiving And Inspection," contrary to the requirements of Procedure 20006-C. An inspection by QC might have prevented unflagged weld rods from entering the Nuclear Operations stock.

Corrective steps which have been taken and the results achieved:

The weld filler material in the Maintenance Toolroom and the Nuclear Operations Warehouse has been inspected for compliance with Procedure 25340-C. Deficiency Card (DC) #1380382 was written against weld filler material which was found to be improperly flag tagged in the Nuclear Operations Warehouse. The discrepant material found in the Nuclear Operations Warehouse will be dispositioned appropriately. DC #1880117 was written against the weld filler material found by the NRC inspector to be improperly flag tagged in the Maintenance Toolroom. The weld filler material identified by DC #1880117 was discarded due to loss of traceability. Maintenance Engineering conducted another review of the Nuclear Operations Warehouse on March 4, 1988 for any discrepant weld filler materials that do not meet the requirements of Procedure 25340-C. Four DCs were initiated as a result of Maintenance Engineering's review of the Nuclear Operations Warehouse and remain to be dispositioned. In addition, QC has initiated an Inspection Plan #RM-M-01, Rev. 0, "Receipt Inspection of Weld Filler Material," which will verify flag tagging of weld rods regardless of whether the weld rods were procured offsite or were transferred from the Construction Warehouse.

Corrective steps which will be taken to avoid further violations:

Future purchases and transfers of welding filler material will be received and inspected so that the requirements of Procedure 25340-C are met. In addition, revisions to other procedures will be considered in an effort to preclude further procurement or transfer of discrepant material.

Date when full compliance will be achieved:

Full compliance will be achieved on April 8, 1988 when an inspection by QC for discrepant weld filler material in the Nuclear Operations Warehouse and the Maintenance Toolroom will be completed. Any discrepant weld filler material found will be appropriately dispositioned by May 15, 1988.