Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-6526

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

Georgia Power
the southern electric system

L. T. Gucwa
Manager Nuclear Safety
and Licensing

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

PLANT VOGTLE - UNITS 1, 2
NRC DOCKETS 50-424, 50-425
OPERATING LICENSE NPF-68, CONSTRUCTION PERMIT CPPR-109
SER OPEN ITEM 5: GENERIC LETTER 83-28

Gentlemen:

In Supplement 5 of the Vogtle Safety Evaluation Report, Section 15.8, the NRC staff requested additional information concerning Item 2.2.1 of Generic Letter 83-28. The enclosure provides the requested information.

Please contact this office if you have any questions.

Sincerely,

L. T. Gucwa

JH/lm

Enclosure: Additional Information - Generic Letter 83-28 Item 2.2.1

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

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Georgia Power

ENCLOSURE

PLANT VOGTLE - UNITS 1, 2
NRC DOCKETS 50-424, 50-425
OPERATING LICENSE NPF-68, CONSTRUCTION PERMIT CPPR-109
ADDITIONAL INFORMATION - GENERIC LETTER 83-28 ITEM 2.2.1

1. STAFF REQUEST

"Confirmation that a program to identify safety-related components as such on relevant plant documentation exists."

RESPONSE

Components are classified as safety-related in accordance with the Vogtle Electric Generating Plant (VEGP) Project Reference Manual (PRM). Part C, Section 13 of the VEGP PRM describes the classification system assigned to equipment, components, and structures at VEGP and establishes control of the project classification list included in the project Design Manual as Design Criterion DC-1010.

The project classification system defines the extent to which components, equipment, and structures are related to nuclear safety and seismic qualification requirements. In addition, the project classification system identifies the principal codes and standards that govern the design of a component or structure.

Project classifications are used on pertinent documents including, but not limited to, the following:

- Q-List and Project Classification List
- Equipment Lists (Equipment, Valves and Instruments)
- Piping and Instrument Diagrams (P&ID's)
- Procurement Specifications
- Material Control Lists
- Specification Control Log
- Safety Analysis Report

ENCLOSURE (Continued)

ADDITIONAL INFORMATION - GENERIC LETTER 83-28 ITEM 2.2.1

2. STAFF REQUEST

"Confirmation that FSAR Table 3.2.2-1, the instrument index, equipment index and valve index complement each other to form a single, controlled source of safety-related equipment classification information.

The response should also confirm that this FSAR table and the indexes are all controlled by the same group using the same approved procedures for developing, maintaining and validating the FSAR table and the indexes."

RESPONSE

The VEGP project classification list is FSAR Table 3.2.2-1. The instrument index, equipment index, and valve index were developed as ancillary reference documents containing specific listings to supplement FSAR Table 3.2.2-1 which may generalize items such as instruments, valves, and equipment.

FSAR Table 3.2.2-1 and associated indices are prepared and kept current by the architect/engineer during plant design, construction, and startup. Control is maintained by the Georgia Power Company (GPC) nuclear operations department during plant operation.

During plant operation, changes to FSAR Table 3.2.2-1 are governed by 10CFR50.59 through various VEGP administrative procedures. Changes to facility indices are handled by Appendix 3, Section 14 of the Project Reference Manual and VEGP Engineering Procedure 50012-C.

3. STAFF REQUEST

"Confirmation that administrative procedures direct station personnel to use the entire information handling system, which includes the FSAR table in addition to the indexes."

RESPONSE

Administrative procedures at VEGP generally define safety-related in the following manner:

ENCLOSURE (Continued)

ADDITIONAL INFORMATION - GENERIC LETTER 83-28 ITEM 2.2.1

"Systems or components designated as nuclear safety class 0, 1, 2 or 3 and listed in FSAR Table 3.2.2-1; instrumentation designated 1 or 2 as listed in FSAR Table 7.5.2-1; fire protection systems/components as described in procedure 92000-C "Fire Protection Program"; radwaste systems/components having a project classification of XX7, where XX are safety class and seismic class, respectively; and security systems/components."

Although facility indices are used extensively by engineering, maintenance, and work planning, they were developed as ancillary documents to be used, to the extent required, to supplement FSAR Table 3.2.2.1, Piping and Instrumentation Drawings (P&ID's), or other design documents in performing certain job tasks. Depending on the specific information needs, the facility indices are convenient tools, albeit not intended for mandatory use.

4. STAFF REQUEST

"Confirmation that the quality assurance audits and reviews are applied to the preparation and validation of the FSAR Table and indexes that make up the equipment classification information handling system."

RESPONSE

Since FSAR Table 3.2.2-1 and related facility indices for both units are prepared and validated by the architect/engineer, the architect/engineer's quality assurance department is responsible for audits and reviews during development of the overall VEGP equipment classification information handling system. The Georgia Power Company Quality Assurance department is responsible for ensuring that the architect/engineer has an adequate quality assurance program commensurate with the scope of their activities and for performing audits of such activities.

Control of FSAR Table 3.2.2-1 and related indices is maintained by the GPC nuclear operations department during plant operation. The VEGP procedures used to maintain such control come under the scrutiny of the VEGP Operations QA Program during periodic audits of various administrative processes. This responsibility currently applies only to VEGP Unit 1, but the same controlling procedures for maintaining FSAR Table 3.2.2-1 and related facility indices for VEGP Unit 1 will apply to VEGP Unit 2 upon turnover of Unit 2 systems/areas to nuclear operations.