

September 11, 1998

Southern Nuclear Operating Company, Inc.
ATTN: Mr. J. B. Beasley
Vice President
Vogtle Electric Generating Plant
P. O. Box 1295
Birmingham, AL 35201-1295

SUBJECT: MEETING SUMMARY - DISCUSSION OF TECHNICAL SPECIFICATION AND OTHER
REGULATORY ISSUES PERTAINING TO THE VOGTLE ELECTRIC GENERATING
PLANT - DOCKET NOS. 50-424 AND 50-425

Dear Mr. Beasley:

This refers to the September 9, 1998, meeting held to discuss Technical Specification and other Regulatory Issues pertaining to the Vogtle Electric Generating Plant. I have enclosed a list of attendees and a copy of the slides that were used at the presentation.

In accordance with Section 2.790(a) of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

No reply to this letter is required. However, if you have any questions concerning this matter, please contact me at 404-562-4520.

Sincerely,

(Original signed by
Pierce H. Skinner)

Pierce H. Skinner, Chief
Reactor Projects Branch 2
Division of Reactor Projects

Docket Nos. 50-424, 50-425
License Nos. NPF-68, NPF-81

Enclosures:

1. List of Attendees
2. Presentation Slides

cc w/encls: (See Page 2)

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cc w/encls:

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List of Attendees

NRC Attendees

- W. Beckner, Chief, Technical Specifications Branch, Office of Nuclear Reactor Regulation (NRR)
- H. Berkow, Director, Project Directorate II-I, Division of Reactor Projects I/II, NRR
- N. Gilles, Sr. Operations Engineer, Technical Specifications Branch, NRR
- B. Holbrook, Sr. Project Engineer, Reactor Projects Branch 2, Division of Reactor Projects (DRP)
- D. Jaffe, Project Manager, Vogtle Electric Generating Plant, NRR
- J. Luehman, Sr. Reactor Engineer, Technical Specifications Branch, NRR
- J. Johnson, Deputy Regional Administrator
- V. McCree, Deputy Director, Division of Reactor Safety (DRS)
- L. Plisco, Director, Division of Reactor Projects
- C. Rapp, Project Engineer, Reactor Projects Branch 2, DRP
- W. Rogers, Sr. Reactor Analyst, DRS
- K. O'Donohue, Resident Inspector, Vogtle Electric Generating Plant, DRP
- P. Skinner, Chief, Reactor Projects Branch 2, DRP
- J. Zeiler, Sr. Resident Inspector, Vogtle Electric Generating Plant, DRP

Southern Nuclear Operating Company, Inc. (SNC) Attendees

- J. Bailey, Manager, Licensing, Southern Nuclear Operating Company, Inc.
- L. Ward, Manager, Nuclear Engineering and Licensing, Vogtle Electric Generating Plant (VEGP)
- J. Stringfellow, Project Engineer, VEGP
- B. Beasley, Vice-President, VEGP
- M. Sheibani, Supervisor, Nuclear Safety and Compliance, VEGP
- G. Frederick, Assistant General Manager, Plant Support, VEGP

NRC MEETING

September 9, 1998

**Introduction/
Organizational Changes**

Barnie Beasley

TS/Corrective Actions

George Frederick

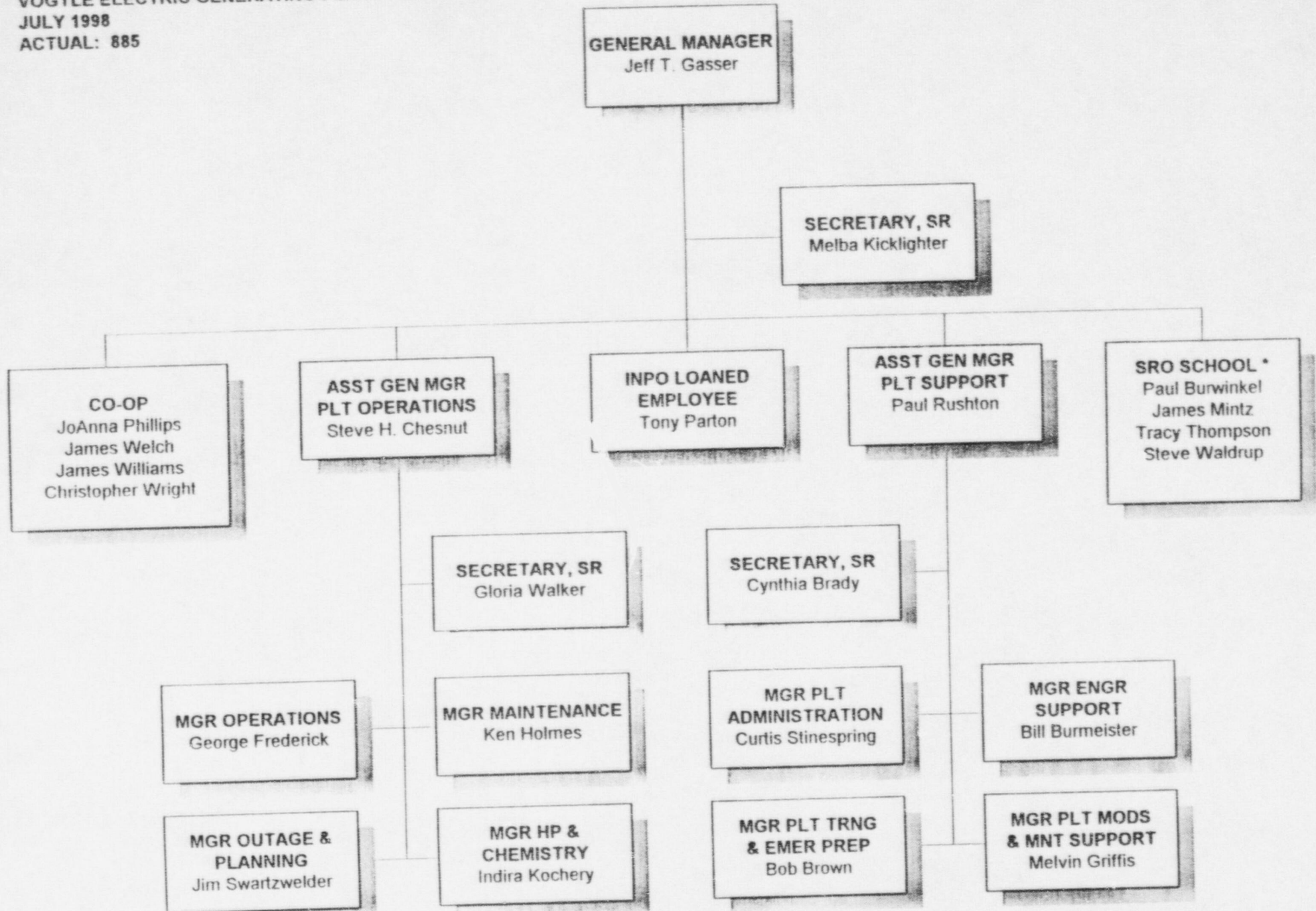
TS Bases/Interpretations

Jack Stringfellow

Operability/Maintenance

Lewis Ward

VOGTLE ELECTRIC GENERATING PLANT
 JULY 1998
 ACTUAL: 885



* School starts in August 1998

USE OF TECHNICAL SPECIFICATION BASES

- Recent conversations with NRC staff have introduced an element of confusion within SNC with regard to the proper role of the TS Bases and TS compliance.
- Specifically, we were told that the Bases cannot be used to address TS compliance (because the Bases is our document and we can change it under 10 CFR 50.59), and the NRC does not review and approve TS Bases.
- It is our hope to clarify with this discussion that the above statements were made in the context that the Bases should not represent a potential conflict with the TS requirements but rather they should facilitate proper interpretation and application of TS requirements.
- To this extent, the Bases are essential for ensuring compliance with the TS.

USE OF TECHNICAL SPECIFICATION BASES

- Examples where Bases are used to address TS compliance:
 - Recent VEGP TS amendments 101 and 79, dated June 1, 1998.
 - Compliance with OPDT and OTDT gain and reference value inequalities (TS Table 3.3.1-1, Notes 1 and 2).
 - Airlock door/bulkhead (LCO 3.6.2)
 - Bases revised to clarify that bulkhead is equivalent to door provided that other bulkhead/door is OPERABLE.
 - In general, LCO descriptions in the Bases are used to define the scope of the LCO requirements - what exactly is required to be OPERABLE.
- Examples where NRC has reviewed and approved Bases:
 - In September 1992, the NRC issued Revision 0 to NUREG-1431 with associated Bases. In April 1995, Revision 1 was issued with corresponding Bases. Each and every Technical Specification Task Force (TSTF) traveler that involves a Bases change (aside from the editorials) undergoes NRC review.

USE OF TECHNICAL SPECIFICATION BASES

- Examples where NRC has reviewed and approved Bases (continued):
 - The current VEGP TS Bases (based on NUREG-1431) were reviewed and approved by the NRC. The following is an excerpt from the SER for the VEGP improved TS:
 - “The STS (*Standard Technical Specifications*) and associated Bases reflect the results of a detailed review of the application of the criteria in the interim policy statement to generic system functions.....Accordingly, the STS Bases offer an abundance of generic information regarding the extent to which the STS present requirements which are necessary to protect the public health and safety.”
 - The Bases Control Program requires NRC review and approval of Bases changes that are associated with TS changes.
 - The Bases Control Program restricts implementation of Bases changes without prior NRC approval to those changes that do not involve an unreviewed safety question as defined by 10 CFR 50.59.
 - Recent NRC approved amendments to the VEGP TS.

USE OF TECHNICAL SPECIFICATION BASES

- In January 1988, the use of the TS Bases was identified to the NRC as a key implementation issue with respect to the development of the improved standard TS.
- Mr. Murley of the NRC responded with the following:
 - “TS Bases will provide information to facilitate proper interpretation and application of TS requirements. Bases are also used for determining the purpose of existing requirements when changes to the TS are being considered. In short, Bases provide the technical underpinning for TS requirements. Any change to this technical underpinning that would influence the way the requirement might be interpreted or applied should be subject to prior staff approval because it would, in effect, be a TS change. However, changes that do not erode this technical underpinning should not require staff approval.”
- The Bases should never be in conflict with or override the TS requirements. Nevertheless, the Bases are essential for proper interpretation and application of TS requirements, and therefore, TS compliance.

**OPERABILITY OF SYSTEMS, STRUCTURES AND COMPONENTS
DURING PREPLANNED MAINTENANCE/MODIFICATIONS**

Reason for Discussing This Topic

- Recent Vogtle issue: failure of a component to meet seismic requirements was equated with inoperability of the component or system.
- Similar questions regularly arise due to temporary degradation of design features related to missile protection, EQ, flooding, high energy line break, fire protection, etc.
- Vogtle uses several methods of treating these temporary conditions, which will be discussed.
- Rigorous treatment of these temporary conditions as affecting equipment operability will adversely affect the ability to perform maintenance and modifications, and could impact plant safety and reliability.

Historical Treatment

- Temporary reduction of seismic capability that, by itself, does not render the equipment incapable of performing its intended function has not generally been treated as an LCO condition for the component.

Examples:

- Removal of a snubber – TRM specifically allows this for 72 hours.
- Removal of card clamps during card replacement.
- Removal of battery rack seismic rail for cell replacement.

- Similarly, other temporary conditions necessary to perform maintenance and modifications have not been treated as LCO conditions for the associated equipment:

Examples:

- Removal of DG exhaust stack missile barrier for modification.
- Opening of HELB and watertight doors to access equipment.
- Removal of floor plugs for filter access
- Excedence of replacement interval for EQ equipment

- If appropriate, engineering evaluations and/or 10 CFR 50.59 reviews are performed for these temporary conditions

Recent Examples

- Battery rack seismic rail removal during replacement cell.
 - Pre-planned, engineering evaluation, procedure with 50.59
- DG missile barrier removal during exhaust stack modification.
 - Pre-planned, engineering evaluation as part of design change package with 50.59
- Routing of hoses through HHELB doors for spray additive tank draining.
 - Pre-planned, engineering evaluation

Status

- Continue to apply G.L. 91-18 guidance, where appropriate, to allow operation with degraded conditions, even when the degraded conditions has been created as part of the maintenance or modification.
- For pre-planned work, continue to apply engineering evaluations as appropriate.
- Follow NEI/NRC efforts on development of risk-informed approach to evaluating reduced seismic loads under temporary conditions.

Failure to Correctly Identify TS Limiting Condition for Operation (LCO)

- Categorically the several violations or events represent different degrees of safety significance:
 - Those involving compliance with plant procedures.
 - Those involving instances where all applicable LCO's were not properly identified.
 - Those instances involving a failure to comply with applicable T/S LCO's.

Determine Causes

- Licensed Operator knowledge of the Improved Technical Specification (ITS). Some Operators may rely on their knowledge of TS.
- Inadequate procedure/guidance to control Mode changes and LCO entry and exit.
- A lack of supervisory follow-up to ensure operator compliance.

Corrective Action Plan

- A review of all violations and events since January 1997 was performed.
- Corrective actions were developed to address these events using a “barrier” defense.

Corrective Action Plan

- Key elements of the plan based on root causes include:
 - Additional licensed operator training in 1998 and all of 1999 on the content and application of the ITS.
 - Enhancing the Unit Operating Procedures and surveillance procedures so that LCO entry and exit conditions are more clearly and completely controlled.
 - Developing expectations and monitoring licensed operator implementation and application of the TS.