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

Mailing Address. Post Office Box 4545 Atlanta, Georgia 30302

W. G. Hairston, III Senior Vice President Nuclear Operations

the southern electric system

NON-00284 0039e

September 12, 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 50-424/88-31 which concerns the inspection conducted by Mr. J. F. Rogge of the NRC Region II staff on July 2 - August 2, 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 the  $\ensuremath{\mathsf{GPC}}$  response.

Should there be any questions in this regard, please contact this office at any time.

Sincerely,

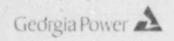
W. G. Hairston, III

KP/11h

Enclosure:

1. Violation 88-31-01 and GPC Response

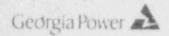
c: (see next page)



U. S. Nuclear Regulatory Commission September 12, 1988 Page Two

c: Georgia Power Company
Mr. P. D. Rice
Mr. G. Bockhold, Jr.
Mr. J. E. Swartzwelder
Mr. J. P. Kane
GO-NORMS
VOGTLE-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. Roge, Senior Resident Inspector - Operations, Vogtle



#### ENCLOSURE

# PLANT VOGTLE - UNIT 1 NRC DOCKET 50-424 OPERATING LICENSE NPF-68 NRC NOTICE OF VIOLATION 88-31-01 AND GPC RESPONSE

#### VIOLATION 50-424/88-31

"Technical Specification 6.7.1a. requires, in part, that written procedures shall be implemented as applicable from Appendix A of Regulatory Guide 1.33, Revisior 2, February 1978. Regulatory Guide 1.33 requires maintenance procedures for the performance of work to be implemented.

Contrary to the above, on July 26, Maintenance Work Order 18803134 was not fully implemented in that specific instructions requiring personnel and equipment to be present and able to immediately reseal an open electrical floor penetration was not implemented. This requirement was established in the Maintenance Work Order to ensure flood protection features would be restorable if necessary.

This is a Severity Level V violation (Supplement I)."

# RESPONSE TO VIOLATION 50-424/88-31-01

# Admission or denial of the alleged violation:

The violation occurred as stated.

# The reason for the violation:

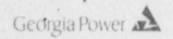
The violation occurred due to personnel error in that the craft supervision involved in the repair of penetration seal 1-11-0128-3 did not adhere to step 4.1.14 of procedure 00432-C, Rev. 1, "Penetration Seal Control."

# The corrective steps which have been taken and the results achieved:

The corrective steps taken to address this incident are summarized as follows:

 The penetration seal repair effort was completed by Unit 2 craft personnel on July 25, 1988.

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#### ENCLOSURE (continued)

#### NRC NOTICE OF VIOLATION 88-31-01 AND GPC RESPONSE

- 2. A deficiency card (#1-88-2025) was written on July 26, 1988, to document the lack of adherence to procedure 00432-C.
- Personnel changes were made to improve the coordination of future penetration seal repair activities.
- 4. Craft personnel received training on the referenced procedure on August 1, 1988. In addition, craft supervisory personnel were re-trained on this date. Both craft and supervisory personnel have been instructed to seek guidance as necessary on future procedural questions.

#### The corrective steps which will be taken to avoid further violations:

It is anticipated the aforementioned measures will preclude a recurrence of this incident.

# Date when full compliance will be achieved:

Full compliance was achieved on July 26, 1988, when Unit 2 craft personnel completed the penetration seal repair work.