

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

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

R. P. McDonald
Executive Vice President
Nuclear Operations

the southern electric system

SL-4597
0909m
X7GJ17-V120

May 19, 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

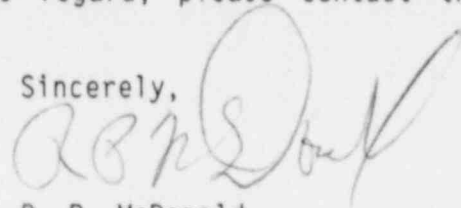
Gentlemen:

In accordance with the provisions of 10 CFR 2.201, Georgia Power Company (GPC) submits the enclosed information in response to the NRC Region II letter dated April 19, 1988, and NRC Inspection Report 50-424/87-71 which concerns the inspection conducted by Messrs. G. R. Wiseman and D. C. Ward of the NRC Region II staff on December 8-11, 1987. A copy of this response is being provided to the NRC Region II office for review.

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

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

Sincerely,



R. P. McDonald

JAE/lm

Enclosures:

1. Violation "A" and GPC Response
2. Violation "B" and GPC Response

c: (see next page)

8805010162 880519
PDR ADOCK 05000424
Q DCD

TE01
||

U. S. Nuclear Regulatory Commission
May 19, 1988
Page Two

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 1

PLANT VOGTLE - UNIT 1
NRC DOCKET 50-424
OPERATING LICENSE NPF-68
NRC NOTICE OF VIOLATION "A" AND GPC RESPONSE

VIOLATION "A" (VIOLATION 50-424/87-71-03)

"A. The Facility Operating License (NPF-68) Condition G requires GPC to implement and maintain in effect the provisions of the fire protection program described in the FSAR, specified licensee submittals, and SER through Supplement 5.

Section 9.5.1.5.3 of the VEGP-FSAR requires the fire team manning to be met without impacting of the minimum onshift operating staff designated in the Vogtle Technical Specifications.

Contrary to the above, on 25 shifts during the period between January 16, 1987 and November 30, 1987 the licensee could not man a qualified five man fire brigade exclusive of the Technical Specification minimum operating staff. Twenty of the 25 cases resulted from a qualified fire brigade captain not being available. The remaining five cases resulted from less than five qualified brigade members being available onsite.

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

RESPONSE TO VIOLATION "A" (VIOLATION 50-424/87-71-03)

Admission or denial of alleged violation:

Georgia Power Company (GPC) admits that a violation did occur. However, after careful and considered review of the event and 10CFR2, Appendix C, Supplement I, GPC believes that the severity level should be reclassified to a severity level V, "violations that have minor safety or environmental significance," based on the following information.

As discussed with NRC Region II staff personnel on February 10, 1988, the safety intent of shift manning requirements is to provide adequate qualified personnel to concurrently perform alternate (remote) shutdown and extinguish a control room fire. It has been our position that a three member remote shutdown crew could accomplish shutdown of the unit in the event of a fire in the control room. Remote shutdown using a three member team has been demonstrated via simulation to the satisfaction of the NRC thus indicating that safe shutdown can be accomplished and safety functions maintained. Given that, minimum shift

ENCLOSURE 1 (Continued)

NRC NOTICE OF VIOLATION "A" AND GPC RESPONSE

staffing can be accomplished using eight persons consisting of a five member fire brigade plus an independent three member remote shutdown team of one Senior Reactor Operator (SRO) and two Reactor Operators (ROs). The FSAR will be clarified to reflect this position.

Using the eight member minimum on-shift crew, there was only one (1) twelve hour shift during the period between January 16, 1987 and November 30, 1987, which had less than the minimum five member fire brigade. On February 6, 1987, the fire brigade leader position was held by an individual whose qualification had lapsed. The individual in question lacked quarterly training as a fire brigade member, but, was current in his fire brigade leader training. During the remainder of the period cited in the Notice of Violation, a five member fire brigade of the proper composition and an independent three member remote shutdown crew as described above were available.

The single shift when the minimum fire brigade requirement was not met had two SROs, two ROs, and three Non-Licensed Operators not assigned to the fire brigade. The event involving the single shift occurred prior to initial criticality while the unit was in Mode 5 (Cold Shutdown). It is our belief that the designated fire brigade leader whose brigade member training had lapsed would have performed his job correctly and safely had an actual fire occurred.

Based on the foregoing information, GPC requests a downgrade in severity level to Severity Level V.

Reason for the violation:

The violation occurred due to procedural inadequacy. The procedural inadequacy resulted from Operations Administrative Procedure (10003-C) being written to allow the fire brigade to be manned by personnel composed of the Technical Specification minimum crew.

Corrective steps which have been taken and the results achieved:

The corrective actions taken and the results achieved are as follows:

1) Immediate Corrective Actions:

A letter dated December 2, 1987 was sent from the Operations Superintendent-Support to all On-Shift Operations Supervisors (OSOSs) which stated that the fire team and Technical Specification minimum crews shall be separate.

ENCLOSURE 1 (Continued)

NRC NOTICE OF VIOLATION "A" AND GPC RESPONSE

2) Subsequent Corrective Actions Include:

A revision dated December 9, 1987 was made to Procedure 10003-C, Rev. 5, "Manning the Shift", which stated that the On-Shift Operations Supervisor, Shift Supervisor, Reactor Operator, Balance of Plant Operator, Auxiliary Building Operator, or Outside Area Operator shall not be assigned to the Fire Team.

3) Results of Corrective Actions

Due to the prompt response to the procedural error there were no shift assignments made that were in violation of FSAR section 9.5.1.5.3 after December 2, 1987. Also management attention to training, qualification, and scheduling has been greatly increased following this violation.

Corrective steps which will be taken to avoid further violations:

Based on the results of the followup inspection 50-424/88-16 on March 7-10, 1988 and the results reported in the Notice of Violation, the following additional corrective actions will be made:

- 1) A change will be initiated to reduce the limitations stated in section 9.5.1.5.3 of the FSAR. The change will allow the Unit Shift Supervisor and the two Non-Licensed Operators listed as the minimum shift crew as specified in the Technical Specifications to be members of the Fire Team provided that a minimum independent crew of three licensed operators (one SRO and two ROs) is available on shift to perform a remote shutdown in the event of a control room fire.
- 2) Procedure 10003-C, will also be revised to reflect the change in the FSAR.

Date when full compliance will be achieved:

Full compliance was achieved on December 9, 1987 with the revision to Procedure 10003-C.

ENCLOSURE 2

PLANT VOGTLE - UNIT 1
NRC DOCKET 50-424
OPERATING LICENSE NPF-68
NRC NOTICE OF VIOLATION "B" AND GPC RESPONSE

VIOLATION "B" (VIOLATION 50-424/87-71-02)

"B. The Facility Operating License (NPF-68) Condition G requires GPC to implement and maintain in effect the provisions of the fire protection program described in the FSAR, specified licensee submittals, and SER through Supplement 5.

Section 9.5.1 and Appendix B Section C.1.a of the VEGP-FSAR states that the fire protection program will be implemented through procedures. Specifically, Section 3.4 of Procedure 10003-C, Shift Manning, and Section 2.2.1 of Procedure 10001-C, Log Keeping, require the fire team members to be designated at the beginning of each shift and the assignment of each of the shift operations personnel to be documented in the shift supervisor log. In addition, these procedures require logs to be complete and accurate.

Contrary to the above, the fire protection program was not implemented in that procedural requirements for assigning the shift fire brigade were not implemented. On numerous occasions during the period from January 17, 1987 to November 30, 1987, fire brigade assignments were not documented in the shift supervisor's log.

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

RESPONSE TO VIOLATION "B" (VIOLATION 50-424/87-71-02)

Admission or denial of alleged violation:

The violation occurred as stated.

Reason for the violation:

The reason for the violation was a failure by Operations personnel to follow existing procedures. At Plant Vogtle the assignment, designation and documentation of the Fire Team is controlled by several different procedures.

The following procedures are in place to provide guidance concerning shift Fire Team manning and log keeping:

ENCLOSURE 2 (Continued)

NRC NOTICE OF VIOLATION "B" AND GPC RESPONSE

- 1) Procedure 92000-C, Rev. 4, "FIRE PROTECTION PROGRAM", identifies the assignment of the Fire Team as the responsibility of the On-Shift Operations Supervisor (OSOS) in accordance with procedures 10003-C, "Manning the Shift", and 10004-C, "Shift Relief".
- 2) Procedure 10000-C, Rev. 6, "CONDUCT OF OPERATIONS", states the OSOS has the following duty: "Ensures that the shift is properly manned, the Fire Team constituted and team captain designated in accordance with 10003-C "Manning The Shift"."
- 3) Procedure 10003-C, Rev. 7, "MANNING THE SHIFT", state . "A Fire Team consisting of at least 5 members (including a team captain) shall be maintained on site at all times. The OSOS shall designate the Fire Team captain and members at the beginning of each shift."
- 4) Procedure 10001-C, Rev. 5, "LOGKEEPING", states: "The Shift Supervisor Log should have an entry prefaced by the time of occurrence, for activities on shift including:
 - a) The name and position of each operator on shift."

At each shift briefing the OSOS designates the Fire Team captain and four Fire Team members from the plant Fire Brigade. Immediately following the shift briefing, the shift clerk posts the names of the Fire Team on the Shift Manning Board which is located in the Control Room in clear view of the AT-THE-CONTROLS area. This guidance for the OSOS to designate the Fire Team at the beginning of each shift and the posting of the Fire Team on the Shift Manning Board has been done on each shift since before receipt of our Operating License. The documentation of the Fire Team in the SS Log was achieved by entering a name for each position on the shift manning stamp. On several occasions the entries on the shift manning stamp were incomplete.

Corrective steps which have been taken and the results achieved:

Corrective actions include the following:

- 1) The shift manning stamp has been updated to reflect the current shift complement, and
- 2) Operations management issued a letter reinforcing the requirements of quality log keeping.

ENCLOSURE 2 (Continued)

NRC NOTICE OF VIOLATION "B" AND GPC RESPONSE

These corrective actions resulted in a significant reduction of log keeping errors in the last quarter of 1987.

Corrective steps which will be taken to avoid further violations:

It is anticipated that the aforementioned steps will preclude recurrence of this violation.

Date when full compliance will be achieved:

Full compliance was achieved on November 2, 1987 with the implementation of the Operations Improvement Plan concerning log keeping.