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May 16, 1986

United States Nuclear Regulatory Commission  
Region II  
Suite 2900  
101 Marietta Street, Northwest  
Atlanta, Georgia 30323

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Reference: 50-424/86-09, 50-425/86-04

Attention: Mr. Virgil L. Brownlee

The Georgia Power Company wishes to submit the following information concerning the violation identified in your inspection report 50-424/86-09 and 50-425/86-04:

Violation 50-424/86-09-01, "Failure to Perform an Adequate System Walkdown During the Turnover of Safety-Related Systems" - Severity Level IV

The violation identifies a number of discrepancies between the as-built configurations of the Residual Heat Removal (RHR) System and the Nuclear Service Cooling Water (NSCW) System and the latest Piping and Instrumentation Diagram (P&ID) drawings for those systems. These discrepancies were not identified on the system punchlists as required by Startup Manual Procedure SUM-17 even though a walkdown inspection had been conducted on the systems during turnover as required by Construction Department procedure GD-A-49. Georgia Power Company offers the following response pursuant to the criteria of 10 CFR 2.201:

Georgia Power Company acknowledges the violation as identified in the USNRC inspection report.

The violation is attributed to two basic causes:

1. Discrepancies existed between engineering P&ID's and piping isometric drawings. Revisions made to one type of drawing were not always transferred to the other type in a timely manner. A program was in place to reconcile the drawings but was not completed at the time of the USNRC inspection.
2. Contrary to project procedural requirements, turnover walkdowns were not conducted with the degree of thoroughness necessary to detect discrepancies of the types identified in the violation. The walkdowns were used primarily as a means of determining whether or not specific items were installed.

The specific discrepancies identified with the RHR and NSCW systems in the violation have either been corrected or have been identified on deviation reports to ensure they are properly addressed.

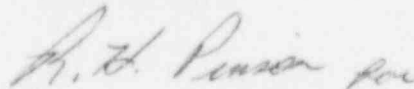
Project engineering is taking prompt action to incorporate all identified changes to the P&ID drawings. The remainder of the design document changes resulting from the previous drawing consistency reviews will be issued by May 31, 1986, for all safety-related systems. In addition, a final consistency review will be performed for safety-related systems when the piping isometric drawings are "as-built" as part of the piping finalization program.

Following the drawing reconciliations, comprehensive walkdown inspections, using the P&ID's for mechanical attributes, will be performed jointly by the Construction and Nuclear Operations Departments on all turned-over safety-related systems. Any discrepancies identified during the walkdowns will be documented on appropriate deviation reports. The walkdowns and any resulting actions are expected to be completed by September 1, 1986.

To prevent further violations, procedure GD-A-49 is being revised to include provisions for identifying discrepancies between isometric drawings and P&ID's during turnover walkdowns and documenting them on Master Tracking System punchlists. Construction engineering personnel responsible for performing turnover walkdowns will be retrained in the requirements of procedure GD-A-49, particularly in the use of both isometric drawings and P&ID's and in obtaining the necessary depth of review during walkdowns. Retraining is expected to be completed by June 20, 1986. In addition to documenting discrepancies on punchlists, walkdown personnel will also ensure that the discrepancies are identified on appropriate documents to ensure they are properly dispositioned.

This response contains no proprietary information and may be placed in the USNRC Public Document Room.

Yours truly,



D. O. Foster

REF/DOF/tdm

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