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LCV-1245-B

November 17, 1998

Docket Nos. 50-424
50-425

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

Ladies and Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
REPLY TO A NOTICE OF VIOLATION

Pursuant to 10 CFR 2.201, Southern Nuclear Operating Company submits the enclosed information in response to Example 2 of a violation identified in Inspection Reports 50-424,425/98-05 concerning an inspection conducted from May 17 through June 27, 1998. Southern Nuclear Operating Company previously admitted in a letter dated August 18, 1998 that Example 1 of the subject violation occurred as stated. In addition, corrective steps that will be taken to avoid further violations for Example 1 have been modified.

Please contact this office if you have any questions.

Sincerely,

J. B. Beasley, Jr.

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Enclosure: Reply to a NOV 50-424,425/98-05-01

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ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO A NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424; 425/98-05

VIOLATION 50-424;425/98-05-01

The following is a transcription of the violation as cited in the Notice of Violation (NOV):

“During an NRC inspection conducted May 17, 1998, through June 27, 1998, a violation of NRC requirements was identified. In accordance with the ‘General Statement of Policy and Procedure for NRC Enforcement Actions,’ (NUREG 1600), the violation is listed below:

Unit 2 Technical Specification (TS) Limiting Condition for Operation (LCO) 3.0.4 states that when a limiting condition of operation is not met, entry into a mode or other specified condition in the Applicability shall not be made except when the associated actions to be entered permit continued operation in that mode or other specified condition in the Applicability for an unlimited period of time. Exceptions to LCO 3.0.4 are stated in the individual Specifications.

Contrary to the above:

1. On April 19, 1998, Unit 2 entered Mode 2 (from Mode 3) without meeting the LCO of TS 3.3.2, ‘Engineering Safety Feature Actuation System (ESFAS) Instrumentation,’ Table 3.3.2-1, Item 5, which requires two trains of the Turbine Trip function to be operable prior to entering Mode 2. Action Condition H was applicable and has a limited completion time of six hours. TS 3.3.2 does not contain an LCO 3.0.4 exception statement.
2. On June 10, 1998, Unit 2 entered Mode 4 (from Mode 3) without meeting the LCO of TS 3.4.12, ‘Cold Overpressure Protection Systems,’ which required two reactor coolant system relief valves to be operable. The licensee entered Mode 4 while in Action Condition D of TS 3.4.12, for one pressurizer power operated relief valve (PORV) being inoperable. This Specification has a limited completion time of 7 days and does not contain an LCO 3.0.4 exception statement.

This is a Severity Level IV violation (Supplement I).”

RESPONSE TO VIOLATION (50-424;425/98-05-01)

EXAMPLE 1

Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424; 425/98-05

Reason for the Violation:

1. On April 19, 1998, electrical links in the Unit 2 electro-hydraulic control (EHC) cabinet had been opened to defeat some reactor trip breaker inputs to the turbine trip function. This allowed personnel to intermittently open the main turbine valves to warm the turbine shell with the reactor trip breakers open. Otherwise, a turbine trip would have been generated due to the reactor trip breakers being open. Subsequently, Unit 2 entered Mode 2 from Mode 3. In accordance with the TS, the turbine trip function is required to be operable in Mode 2.

The electrical links in the Unit 2 electro-hydraulic control (EHC) cabinet were closed approximately 2 and 1/2 hours later, restoring the turbine trip function. It was later determined that entry into Mode 2, with the links opened, constituted operation of the unit in a condition prohibited by the Technical Specifications.

The cause of this event was inadequate administrative controls of the work process that allowed the links to remain open when Mode 2 was entered. Departmental procedures did not require the electrical links be closed or the caution tag log be checked prior to the mode change.

Corrective Steps Which Have Been Taken and the Results Achieved:

1. Procedures have been revised to require closure of the links when the reactor trip breakers are closed prior to the mode change.
2. Unit operating procedures were also revised to require that the caution tag log be checked prior to mode changes.
3. This event and issues associated with turbine testing/warming during startup have been addressed in licensed operator requalification training. In addition, shift supervisors have been advised to document, with information LCOs, open links and similar items extending beyond a shift period.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

A TS change that allows Mode 2 entry with administrative controls on the main feedwater system isolation valves and the main steam isolation valves has been evaluated. A TS change is planned for submittal to the NRC.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on April 19, 1998, when the links were closed restoring the turbine trip function.

ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424; 425/98-05

Full compliance was achieved on April 19, 1998, when the links were closed restoring the turbine trip function.

RESPONSE TO VIOLATION (50-424;425/98-05-01)

EXAMPLE 2

Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

Reason for the Violation:

On June 10, 1998, Unit 2 was in Mode 3 implementing recovery actions from the reactor trip and safety injection that occurred on June 9. While in Mode 3 a condition existed with an inoperable pressure transmitter that, in part, provided input to one of the power operated relief valves (PORV) for cold overpressure protection purposes. The other PORV was fully operable for cold overpressure protection purposes. Due to abnormal reactor coolant pump seal leakoff parameters, a decision was made to transition to Mode 4 to correct the seal leakoff condition.

Prior to entering Mode 4, onshift licensed operators and SNC management reviewed the TS/ Bases and made a decision that the evolution was permissible with only one reactor coolant system relief valve operable. This decision was based on an understanding of the purpose and intent of LCO 3.0.4. However, the decision was inappropriate in that proper consideration was not given to conditions required for Mode 4 entry. The reason for the violation was an incorrect interpretation which allowed the bases to override the TS requirements.

Corrective Steps Which Have Been Taken and the Results Achieved:

The decision making process involving the application of Technical Specifications, particularly this event, has been discussed with licensed operators and plant management in requalification training.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

The VEGP Technical Specifications are being reviewed and evaluated to incorporate the NUREG 1431 Revision 1 version of LCO 3.0.4. This review is expected to be completed by December 31, 1998.

ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2
REPLY TO NOTICE OF VIOLATION
NRC INSPECTION REPORTS 50-424; 425/98-05

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on June 10, 1998, when Train A residual heat removal system was placed in service resulting in two operable reactor coolant system relief valves while in Mode 4.