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February 10, 1998

Docket No. 50-424
50-425

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

LCV-1162-A

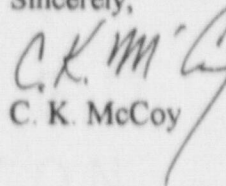
Ladies and Gentlemen:

**VOGTLE ELECTRIC GENERATING PLANT
REPLY TO A NOTICE OF VIOLATION**

Pursuant to 10 CFR 2.201, Southern Nuclear Operating Company (SNC) submits the enclosed information for Vogtle Electric Generating Plant (VEGP) in response to a violation identified in Nuclear Regulatory Commission (NRC) Integrated Inspection Report Nos. 50-424;425 / 97-11, during an inspection conducted from November 2, 1997, through December 13, 1997. In the enclosure, a transcription of the violation precedes SNC's response.

Should you have any questions feel free to contact this office.

Sincerely,


C. K. McCoy

CKM/CTT/afs

Enclosures: Reply to NOV 50-424;425/ 97-11

cc. Southern Nuclear Operating Company
Mr. J. B. Beasley, Jr.
Mr. M. Sheibani
NORMS

U. S. Nuclear Regulatory Commission
Mr. L. A. Reyes, Regional Administrator
Mr. D. H. Jaffe, Senior Project Manager, NRR
Mr. John Zeiler, Senior Resident Inspector, Vogtle

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ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424; 425/ 97-11

VIOLATION (50-424;425/ 97-11-02)

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

"During an NRC inspection conducted November 2 through December 13, 1997, 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:

Technical Specifications (TS) Surveillance Requirement (SR) 3.3.1.4, Reactor Trip System Instrumentation, requires that a 31-day staggered Trip Actuation Device Operability Test (TADOT) be performed to verify that the reactor trip breaker and bypass breaker auxiliary and cell switch contacts, used as P-4 interlock, provide the initiation signal to Solid State Protection System (SSPS) and turbine Electrohydraulic Control (EHC) systems.

Procedures 14420-1, "Solid State Protection System and Reactor Trip Breaker Train A Operability Test," Revision (Rev.) 27; 14420-2, "Solid State Protection System and Reactor Trip Breaker Train A Operability Test," Rev. 19; 14421-1, "Solid State Protection System and Reactor Trip Breaker Train B Operability Test," Rev. 8; and 14421-2, "Solid State Protection System and Reactor Trip Breaker Train B Operability Test," Rev. 6, provide the necessary guidance to perform the 31-day staggered test.

TS SR 3.3.2.9, Engineered Safety Feature Actuation System Instrumentation, requires that an 18-month TADOT be performed to verify that the P-4 signal is generated for both the SSPS and EHC systems. This test verifies that the P-4 signal is generated from both the reactor trip and bypass breakers.

Procedure 14752-1, "Reactor Trip System P-4 Interlock Test," Rev. 4; and 14752-2, "Reactor Trip System P-4 Interlock Test," Rev. 4, provide the test method to verify that the P-4 signal is generated to SSPS from the reactor trip and bypass breakers. In addition, Procedures 14752-1/2 test that the P-4 signal is generated to the EHC from the reactor trip breaker.

Contrary to the above, since initial startup of both Units 1 and 2, Procedures 14420-1/2 and 14421-1/2 were inadequate, in that, they failed to test all auxiliary and cell switch contacts of the reactor trip and bypass breakers in accordance with TS SR 3.3.1.4. Additionally, Procedures 14752-1/2 were inadequate, in that, they failed to test the P-4 signal generated to the EHC system from the reactor trip bypass breakers in accordance with TS SR 3.3.2.9.

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

ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424; 425/ 97-11

RESPONSE TO VIOLATION (50-424;425 / 97-11-02)

Admission or Denial of the Violation:

SNC denies that a violation of TS requirements occurred as stated in the notice of violation.

Basis for Denial:

The reactor trip breaker (RTB) contacts not tested, (the main RTB cell switch contacts (33b) and bypass RTB auxiliary contact (52b)), are active in the P-4 interlock circuit only during surveillance testing and only during the time the associated train of the reactor trip system (RTS) is inoperable and in test, therefore not relied on to generate a trip. According to TS SR 3.0.1, "Surveillances do not have to be performed on inoperable equipment or variables outside specified limits." Therefore the requirements of SR 3.3.1.4 and SR 3.3.2.9 do not have to be performed on these circuits. The requirements of SR 3.3.1.4 are met during the monthly TADOT by testing the converse of these contacts; the main RTB auxiliary contacts (52b) and bypass RTB cell switch contacts (33b), since these contacts are the only contacts utilized for the P-4 interlock on an operable train of RTS. The requirements of SR 3.3.2.9 are met during the 18 month testing of the reactor trip breakers.

Although not required, VEGP does believe it is a good practice to test these design features and they will be included in procedures 14752-1/2.