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Vogtle Project

April 11, 1986

Director of Nuclear Reactor Regulation  
Attention: Mr. B. J. Youngblood  
PWR Project Directorate #4  
Division of PWR Licensing A  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

File: X7BC35  
Log: GN-871

REF: GN-836, BAILEY TO DENTON, 3/17/85

NRC DOCKET NUMBERS 50-424 AND 50-425  
CONSTRUCTION PERMIT NUMBERS CPPR-108 AND CPPR-109  
VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 AND 2  
SER OPEN ITEM 5: GENERIC LETTER 83-28

Dear Mr. Denton:

In the referenced letter responses were provided for paragraphs 1.1 and 1.2 of Generic Letter 83-28. In a telephone discussion with your staff on April 9, 1986, GPC agreed to modify the referenced response to paragraph 1.1 and has done so as documented in Attachment A to this letter. Your staff also requested a current copy of the VEGP Reactor Trip Review Procedure. Attachment B is a copy of the requested procedure.

If your staff requires any additional information, please do not hesitate to contact me.

Sincerely,

J. A. Bailey  
Project Licensing Manager

JAB/sm  
Attachment

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## GENERIC LETTER 83-28

## 1.1 Post - Trip Review (Program Description and Procedure)

Position

Licensees and applicants shall describe their program for ensuring that unscheduled reactor shutdowns are analyzed and that a determination is made that the plant can be restarted safely.

Response

1. VEGP has developed an operational procedure 10006-C, "Reactor Trip Review," which is a systematic safety procedure that will ensure the following restart criteria are met before restart of the reactor is authorized.
  - This procedure is used to identify the root cause of the trip and includes the sequence of events. If the cause of the trip is not apparent, a description of the evaluation in progress is required.
  - The Reactor Trip Review procedure requires corrective action to have been completed or in progress to correct the root cause of the trip.
  - The post trip review reconstructs the sequence of events on data sheets. This sequence of events is then analyzed to determine if the events occurred out of normal sequence, degraded trends in equipment occurred, and/or failed or degraded response of equipment to control signals occurred.
  - The review analyzes the trip to determine if safety-related and other equipment operated as expected.

The Reactor Trip Review looks at all of the above. VEGP classifies reactor trips as Condition I or Condition II. A reactor trip is classified as a Condition I when the cause of the trip is known and has been corrected; all safety-related equipment functioned properly during the trip. A Reactor Trip is classified Condition II when the cause of the trip is not known and/or some safety-related equipment functioned in an abnormal or degraded manner during the trip. If the trip is classified as a Condition II, the Plant Review Board must review the report. The Plant General Manager may authorize a restart prior to Plant Review Board review of the report.

2. The responsibilities and authorities of personnel performing the review and analysis is defined in procedure 10000-C, "Conduct of Operations." The Shift Technical Advisor (STA) will complete the Reactor Trip Report. He has the authority to obtain the necessary personnel and equipment for the post trip review and for gathering and assessing the information.

The On-Shift Operations Supervisor (OSOS) functions as the senior management representative for plant operations on shift and must hold a SRO License. He concurrently assesses the information for the Reactor Trip Report with the STA, and classifies the trip. He provides approval for startup after Condition I trips.

3. The OSOS has the overall authority for directing the post trip review process. The STA has the responsibility for the post trip analysis. They concurrently classify the trip as Condition I or Condition II.
4. ° The operating staff will make a report on data sheets, "Reactor Trip Personnel Statements," of the Reactor Trip Review procedure. If it is necessary for a more accurate analysis, the operating crew on duty during the trip may be available to the review team for interviews.
  - ° A time history of the event is required in the Reactor Trip Review procedure on data sheet "Sequence of Events." The information for this should be available from the Computer Alarm Printout, Pre/Post Trip Logs, and the ERF Computer Printout. Chart records will be included, where necessary.
5. The Reactor Trip Review procedure evaluates the plant response to a trip. A determination is made as to whether the response was within acceptable limits. ~~The data from the review is compared to VEGP Technical Specifications to verify proper operation.~~ If responses were within acceptable limits, the trip is classified as a Condition I trip.
  - ° A sequence of events is reconstructed. This sequence is used to verify automatic functions and to identify any off normal occurrences.
6. If the plant response is not within acceptable limits, the transient is considered a Condition II event. For these events, the Plant Review Board reviews the Reactor Trip Review. The Post Trip review collects the information necessary for an independent assessment. This report is maintained for the life of the plant. The Plant General Manager may authorize restart following a Condition II event.
7. ° The procedure which contains the criteria for determining the acceptability for a restart is 10006-C, "Reactor Trip Review."
  - ° The procedure that has the responsibilities and authorities of key personnel involved in the Post Trip review process is 10000-C, "Conduct of Operations."
  - ° The procedure that deals with determining whether the plant variables and system responses were within specified limits is 10006-C, "Reactor Trip Review."
  - ° The procedure which has the criteria for determining the need for an independent review is 10006-C, "Reactor Trip Review."

The data from the review is compared to VEGP Technical Specifications and applicable FSAR description of the system responses which should occur as various plant parameter or actuation setpoints are reached.