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April 8, 1986

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

File: X7BG1C
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Reference: 50-424/85-62

Attention: Mr. Virgil L. Brownlee

The Georgia Power Company wishes to submit the following information concerning the violation identified in your inspection report 50-424/85-62:

Violation 50-424/85-62-01, "Failure to Provide End Caps to Protect Weld End Preparations for Valves, Fittings, Piping, and Tubing; and Failure to Store Piping Subassemblies in Accordance with Procedures" - Severity Level V.

The violation identified failures to follow the requirements of Revision 8 of site procedure MD-T-12, "Receipt Inspection, Storage, and Issue of Pipe, Pipe Components, and Weld Filler Material," in the following areas:

- a. Openings were not capped on valves, fittings, flanges, pipe, and tubing to protect weld end preparations.
- b. Subassemblies in the warehouse storage yard were not stored on cribbing or equivalent.

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.

In the past, periodic inspections of storage areas were performed by the quality control personnel responsible for material and equipment receipt. Recently, this activity was reassigned to the QC personnel responsible for equipment maintenance and storage. The violation is attributed to the failure of the newly assigned group to pick up warehouse and laydown yard inspections in a timely manner and the failure by warehouse personnel to maintain the adequacy of storage conditions in these areas.

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Pipe spools in the warehouse laydown yard have now been properly stored on cribbing and missing end caps have been replaced.

Project requirements relative to the protection of weld end preparations are being changed. Procedure MD-T-12 requires compliance with construction specification X4AZ01. Revision 14 of X4AZ01 requires the use of caps and plugs on all piping items. A statement is being added to paragraph 1.6.0.C of X4AZ01 to provide relief from the use of caps and plugs to protect weld end preparations on pipe fittings and flanges stored in warehouses. Warehouse storage provides adequate protection for weld end preparations, which often must be reworked during fit-up in the field. These requirement changes are compatible with VEGP Final Safety Analysis Report commitments in that Clarification 2 of FSAR Section 1.9.38.2 requires the use of caps and plugs only when required by the specification.

To prevent further violations, responsible warehouse personnel have been reinstructed in applicable storage requirements and have been admonished to ensure proper storage conditions are maintained. In addition, periodic inspections of storage areas have been reassigned back to receipt quality control, which is more experienced in inspections of this type.

Subsequent to the USNRC inspection which identified the violation, two additional isolated storage discrepancies were identified by other USNRC inspectors.

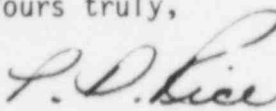
During the week of March 17-21, 1986, Mr. S. J. Vias of the USNRC-Region II noted some snubbers which were improperly stored in the warehouse. Immediate action was taken to correct this discrepancy and responsible warehouse personnel were subsequently reinstructed in snubber storage requirements.

Also during the week of March 17-21, 1986, Mr. W. P. Kleinsorge of the USNRC Region II identified some reinforcing and structural steel which was not stored on dunnage as required by site procedures. Again, prompt action was taken to correct the discrepancies. Civil section personnel responsible for rebar and structural steel storage were admonished to maintain storage conditions as required by procedures.

All corrective actions relative to the violation are expected to be completed by May 1, 1986.

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

Yours truly,


D. O. Foster

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