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Vogtle Project

January 16, 1987

United States Nuclear Regulatory Commission
Region II, Suite 2900
101 Marietta Street, N.W.
Atlanta, GA 30323

File: X7BD102
Log: GN-1230

Reference: Vogtle Electric Generating Plant
Unit 2 - Readiness Review Program

Attention: Mr. J. Nelson Grace

During our visit to your office on October 27, 1986 we expressed our satisfaction with the results of the Pilot Readiness Review Program performed on Unit 1. Georgia Power Company (GPC) considers that the program was a successful test of the concept that a utility can perform a self assessment of its design, construction, and operational preparation processes to increase the assurance that quality program activities have been accomplished in accordance with regulatory requirements.

We believe that both GPC and the Nuclear Regulatory Commission (NRC) have benefited from the Pilot Readiness Review Program in terms of added predictability and stability to the licensing process, early identification and resolution of problems, and early resolution of differences in the NRC's and GPC's interpretation of regulatory requirements. These benefits along with the scheduled systematic review and acceptance of GPC programs by NRC have resulted in a completion and licensing process for Vogtle which avoided many of the last minute problems experienced at certain other nuclear projects.

Based on the above, GPC has initiated conceptual planning for a Unit 2 Readiness Review Program which would take advantage of lessons learned in the Unit 1 pilot program and result in the same benefits for Unit 2. A summary discussion of a Unit 2 Readiness Review Program is provided in the attachment to this letter.

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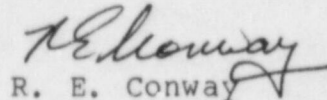


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Mr. J. Nelson Grace
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We believe that a Unit 2 Readiness Review Program would be of mutual benefit to both GPC and the NRC. As we previously discussed on October 27, 1986, it appears that a joint meeting between GPC and the NRC, such as the interaction that occurred in the Unit 1 pilot program development, may be appropriate. We are prepared to proceed with the program in the first quarter of 1987 and look forward to working with you to obtain mutual concurrence on the scope of the program and our planned interactions during this effort.

Very truly yours,


R. E. Conway

RWM/REC/bjd

2 Enclosures

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Attachment 1

cc: U. S. Nuclear Regulatory Commission
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PLANT VOGTLE - UNIT 2
CONCEPTUAL
READINESS REVIEW PROGRAM

Background

In 1984, the Georgia Power Company (GPC) began a pilot program for self-evaluation of Plant Vogtle Unit 1 in response to the recommendations contained in the Nuclear Regulatory Commission (NRC) report to Congress on Improving Quality and the Assurance of Quality in the Design and Construction of Nuclear Power Plants (NUREG-1055). The program, identified as Vogtle Electric Generating Plant Unit 1 Readiness Review Program, was conducted to provide a systematic and disciplined review by GPC and NRC of GPC's implementation of Design, Construction, and Operational preparation processes to increase the assurance that Quality Program activities at Plant Vogtle have been accomplished in accordance with Regulatory Requirements.

Georgia Power's objectives in undertaking a Readiness Review program were many. The primary objective was to perform, as an owner initiated effort, an in-depth self assessment that would provide both early identification of problem areas and a mechanism for early resolution of differences in NRC and GPC interpretations of regulatory requirements. Satisfactory completion of these objectives adds stability and predictability to the licensing process and significantly reduces risks in accomplishing scheduled project completion activities.

Unit 1 Readiness Review Results

The Unit 1 Pilot Readiness Review Program resulted in the identification of a number of findings and corrective actions which GPC believes, based on its own evaluation and on feedback from the independent NRC review of Readiness Review submittals, has confirmed that the systematic approach used in the Unit 1 Pilot Readiness Review Program was effective in achieving program objectives.

Unit 2 Concept

To extend the benefits achieved in the Unit 1 Readiness Review Program to Unit 2, a modified Readiness Review Program should be established to demonstrate continued acceptable conformance to licensing commitments.

Both units of Plant Vogtle are designed, constructed, and are planned to be operated as an integrated facility utilizing common licensing commitments, design criteria, procurement specifications, construction procedures and practices, operations procedures, and operations staff. Therefore, the Unit 1 Readiness Review Program provides a substantial baseline for a Unit 2 Readiness Review Program. As a result, a principal goal of the Unit 2 Readiness Review Program would be to address any changes in regulatory commitments from those assessed for Unit 1. Since the adequacy of the programs applied to Unit 1 was established in the Unit 1 Readiness Review Program, and since essentially the same programs will be followed for Unit 2, the Unit 2 Readiness Review Assessment need not duplicate the Unit 1 effort. Rather, the Readiness Review effort for Unit 2 should supplement the Unit 1 program by demonstrating that the Project continues to comply with licensing commitments and that lessons learned from Unit 1 Readiness Review have been incorporated into Unit 2 programs as appropriate.

The Unit 2 Readiness Review Program concept is summarized as follows:

- Maintain and update the commitment and implementation matrices developed during the Unit 1 program to reflect new or revised commitments, and distribute them to the appropriate Project discipline organizations (e.g., Civil, Mechanical, Electrical) for their use in maintaining program conformance to licensing commitments. Readiness Review would ensure implementation of any new commitments as was done in the Unit 1 Readiness Review Program.
- Establish a list of lessons learned and corrective actions as a result of the Unit 1 Readiness Review Program that would be utilized by the Project to avoid repeating past problems. This list would also be utilized during the Unit 2 Readiness Review Program to include the Unit 1 corrective actions and program changes to avoid recurrence of past problems.

- Sample project design and construction activities and assess the status of installed hardware to the extent necessary to verify continued acceptable compliance with licensing commitments and to demonstrate appropriate compliance to the lessons learned and corrective actions as described above.
- Assess Nuclear Operations implementation of licensing commitments for acceptability of Construction Acceptance Testing activities of the Initial Test Program, Preoperational Test Phase. A separate Readiness Review will not be required for Post Fuel Load programs, where the same procedures and staff assembled for Unit 1 will operate Unit 2. Nuclear Operations has in place a program for the identification and implementation of existing, new or revised commitments that will verify continuing conformance to operational licensing commitments.
- Describe the assessments, results, and evaluations of the Unit 2 Readiness Review Program in supplements to the Unit 1 Readiness Review Program modules.

Potential NRC Interaction

The Unit 2 Readiness Review program is intended to provide added assurance to the Project of the acceptability of quality and licensability of Unit 2 utilizing the effort and results of the Unit 1 assessment, but without duplicating that effort, and without any loss of assurance in the finished product. As module supplements for Unit 2 are completed, the Project would meet with the NRC to apprise them of the assessment results and present the module supplements. In addition, Unit 2 Readiness Review status and progress reports will be presented periodically to the NRC during the early phases of the Unit 2 program. The intent of these presentations and module supplements would be to provide an important part of the basis for Unit 2 acceptance and a high level of confidence in Unit 2 quality.

After presentation of the module supplement by GPC to the NRC it is expected that the NRC would perform an evaluation of the work processes represented by the module. Upon completion of their activities, it is further expected that the NRC would identify areas of concern to GPC for corrective action and issue an acceptance letter.