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the southern electric system

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January 28, 1987

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
101 Marietta Street, NW
Atlanta, GA 30323

File: X7BG10
Log: GN-1342

Reference: Vogtle Electric Generating Plant - Units 1 & 2, 50-424,
50-425; Systematic Assessment of Licensee Performance
Report Nos. 50-424/86-85 and 50-425/86-42

Attention: Mr. J. Nelson Grace

As discussed at our meeting on December 19, 1986, we are generally very pleased with the SALP report for the Vogtle Project. There are some areas where we believe additional information or comments should be provided, and these are provided as follows:

1. Piping Systems and Supports

This area of the report raised the issue of accuracy of information (SALP, Page 9). We believe this incident was an aberration and an isolated deviation from normal practice. I wish to reiterate that we are firmly committed to providing only the most accurate factual information to the NRC and have taken steps that require more specific attention to the details on future submittals.

2. Quality Programs and Administrative Controls Affecting Quality

This area of the report raised the issue of QA staffing (SALP, Pages 19, 20, 41 & 42). As we discussed at the NRC SALP meeting, the senior management of the Company closely monitors the QA staffing needs and requirements in each area to assure an adequate level of manpower. The transfer of QA personnel to other functions and the coincident transfer of high-performance, future potential managers into QA is part of our overall plan to have all of the organizations involved in and knowledgeable of the QA functions and philosophy. We will continue to closely monitor this area to ensure our overall objectives are met.

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Regarding your general concern over extensive use of contractor QA personnel, we would point out that the three contractors assigned to our construction QA group were selected based on their broad nuclear background and previous Plant Vogtle experience. Further, the three to four contractor people used in the operational QA group were specifically obtained for their extensive and broad test experience at other plants. Of key importance is the fact that all contractor personnel work under GPC policies, procedures and supervision.

3. Fire Protection

Two issues were identified in this section of the report.

- a. Both the seismic gap sealant and the structural steel fireproofing were being installed under a QA/QC program (SALP, Page 35). The inspection techniques being utilized were different than those in other areas, but the program was adequate in controlling the work product.
- b. As a correction to the statement on Page 35 of the SALP report, we have four permanent fire protection employees. We think this misunderstanding was a result of a review of the preoperational test program personnel assignments. We are firmly committed to provide sufficient personnel for our fire protection program.

4. Physical Security/Material Control and Accountability

During the construction of any project of this magnitude, priorities for completion of various systems are established. The security system completion followed the completion of several of the other plant systems. There was a great deal of effort put into this system completion. In conjunction with system completion and turnover, we established a completion team made up of construction, testing, security, engineering and vendor representatives. This team, which was similar to other teams for various systems, was tasked to take the lead in completing the system and resolving issues as they arose. They identified many issues in both the construction and testing areas and worked diligently to achieve resolutions. The NRC also helped identify issues.

During all of this period, Vogtle security management was involved. Also, Georgia Power company has taken action to strengthen security management and supervision to ensure that we respond to issues prior to fuel load.

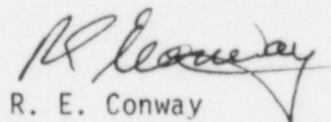
The system enhancement regarding the location of the detection equipment was a specific concern identified by the NRC and, upon review by GPC management, prompt decisions were made to assure resolution. It should be noted that the enhancement was completed in a considerably shorter time than would normally be expected.

We believe that the completion of the security system received its full share of management attention especially as problems were discovered to assure completion to support our plan. All project functions have been involved from early in the process, and a successful installation has resulted.

We do not believe the Category 3 rating takes into account all of the facts and ask for reconsideration on this subject.

5. Training and Qualification Effectiveness

Following the results of the operator examinations in August, 1986, we took immediate action to improve our training program. The results of the December examination (29 passes out of 33 candidates) indicate that our efforts were successful. We will continue to give this area our highest level of attention.



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