

Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-6526

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

L. T. Gucwa
Manager Nuclear Safety
and Licensing



Georgia Power

the southern electric system

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September 16, 1987

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

PLANT VOGTLE - UNIT 1
NRC DOCKET 50-424
OPERATING LICENSE NPF-68
RESPONSE TO NRC INSPECTION REPORT

Gentlemen:

Georgia Power Company (GPC) hereby submits the enclosed revised response to NRC Inspection Report 50-424/87-31, which concerns the inspection conducted by Messrs. J. F. Rogge and R. J. Schepens from April 18 to May 22, 1987. This revised response is submitted as a result of discussions between by Messrs. M. V. Sinkule and W. E. Burns on August 20, 1987.

The enclosures to this letter contain a transcription of the NRC violation and GPC's response.

Please contact this office if you have any questions.

Sincerely,

L. T. Gucwa

JH/lm

Enclosures:

1. NRC Violation 87-31-01
2. Georgia Power Company Response

c: (see next page)

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c: Georgia Power Company

Mr. R. E. Conway
Mr. J. P. O'Reilly
Mr. G. Bockhold, Jr.
Mr. J. F. D'Amico
Mr. C. W. Hayes
GO-NORMS

Southern Company Services

Mr. R. A. Thomas
Mr. J. A. Bailey

Shaw, Pittman, Potts & Trowbridge

Mr. B. W. Churchill, Attorney-at-Law

Troutman, Sanders, Lockerman & Ashmore

Mr. A. H. Domby, Attorney-at-Law

U. S. Nuclear Regulatory Commission

Dr. J. N. Grace, Regional Administrator
Ms. M. A. Miller, Licensing Project Manager, NRR (2 copies)
Mr. J. F. Rogge, Senior Resident Inspector-Operations, Vogtle

Georgians Against Nuclear Energy

Mr. D. Feig
Ms. C. Stangler

0506m

ENCLOSURE 1

PLANT VOGTLE - UNIT 1
NRC DOCKET 50-424
OPERATING LICENSE NPF-68
NRC VIOLATION 87-31-01

VIOLATION 50-424/87-31-01

"Technical Specification 6.7.1a requires that written procedures shall be established, implemented, and maintained covering activities delineated in Appendix A of Regulatory Guide 1.33, Revision 2, February 1987. Administrative Procedure 00350-C "Maintenance Program" establishes administrative controls for maintenance activities by providing for identification, control and documentation of maintenance activities.

Contrary to the above, on May 13, 1987, maintenance was performed on MSIV 1HV-3006B to correct a solenoid valve hydraulic leak without an approved Maintenance Work Order detailing the work instructions. The failure to provide written instructions resulted in MSIV (1HV-3006B) closing when power to the solenoid valves was removed. This resulted in a steam transient which caused a low-low level in the No. 1 steam generator and a subsequent reactor trip from 90 percent reactor power.

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

ENCLOSURE 2

PLANT VOGTLE - UNIT 1
NRC DOCKET 50-424
OPERATING LICENSE NPF-68
RESPONSE TO NRC VIOLATION 87-31-01

RESPONSE TO VIOLATION 50-424/87-31-01

Admission or Denial of Alleged Violation:

The violation occurred as stated in the inspection report.

Reason for the Violation:

The cause of the violation was inadequate work instructions for performing maintenance on Main Steam Isolation Valves (MSIVs) while operating at power. The MSIV disassembly procedure 26854-C, "MSIV Actuator Rockwell Type A Field Disassembly" does not address performing maintenance of the MSIV in a fully open position. Verbal work instructions (an emergency work order) were provided to the maintenance personnel to hydraulically block open the affected Main Steam Supply Line outboard MSIV. However, the MSIV was mechanically blocked open and only one of the redundant hydraulic lines was blocked (isolated). The power was subsequently removed from the MSIV, whereupon the mechanical block failed and the MSIV closed.

Corrective Steps Which Have Been Taken and Results Achieved:

The following corrective actions were taken subsequent to the event occurring:

- (1) Procedure 00350-C, "Maintenance Program", has been revised to limit the use of "Emergency Maintenance" to those activities immediately necessary to maintain safe operation or shutdown capabilities. A new category, "Urgent Maintenance", was created for activities less critical than emergency maintenance which still need to be performed within 24 hours. Initiation of a Maintenance Work Order is required prior to performing urgent maintenance.
- (2) Guidelines describing proper methods to maintain valve position while performing maintenance on MSIV's have been established and provided to Work Planning for implementation. Additionally, this action was expanded to include other critical valves in the main steam supply system (i.e., feedwater isolation valves).

ENCLOSURE 2 (Continued)

RESPONSE TO NRC VIOLATION 87-31-01

- (3) The MSIV disassembly procedure 26854-C has been revised to properly sequence the steps for hydraulically isolating the MSIV.
- (4) Miscellaneous valves associated with the hydraulic operators of the MSIV's, and feedwater isolation valves were temporarily tagged subsequent to the event. A permanent tag has since been installed on these valves.

Corrective Steps Which Will Be Taken to Prevent Further Violation:

Corrective steps to prevent recurrence of violation have already been completed.

Date When Full Compliance Was Achieved:

Full compliance was achieved with the approval and issuance of revised procedure 00350-C on May 18, 1987 and procedure 26854-C on June 12, 1987.