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Georgia Power

the southern electric system

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January 5, 1988

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

PLANT VOGTLE - UNITS 1, 2
NRC DOCKETS 50-424, 50-425
OPERATING LICENSE NPF-68, CONSTRUCTION PERMIT CPPR-109
GENERIC LETTER 83-28 ITEM 2.2.2.

Gentlemen:

In response to your letter dated November 6, 1987, Georgia Power Company submits the enclosed additional information concerning Item 2.2.2. of Generic Letter 83-28.

Please contact this office if you have any questions.

Sincerely,

L. T. Gucwa

JH/lm

Enclosure: Response to RFAI - Generic Letter 83-28 Item 2.2.2.

c: (see next page)

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U. S. Nuclear Regulatory Commission
January 5, 1988
Page Two

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ENCLOSURE

PLANT VOGTLE - UNITS 1, 2
NRC DOCKETS 50-424, 50-425
OPERATING LICENSE NPF-68, CONSTRUCTION PERMIT CPPR-109
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
GENERIC LETTER 83-28 ITEM 2.2.2.

Item 2.2.2. of Generic Letter 83-28 requires that programs be established, implemented, and maintained to ensure that vendor information is complete, current, and controlled throughout the life of the plants, and appropriately referenced or incorporated in plant instructions and procedures. GPC responded to Item 2.2.2. for Plant Vogtle in submittals dated November 8, 1983, and May 20, 1985. By letter dated November 6, 1987, the NRC staff requested additional information concerning the implementation of Item 2.2.2. The following information is provided in response to that request.

1. STAFF REQUEST

"The licensee should show that procedures are implemented to incorporate the vendor technical information into plant procedures."

RESPONSE

Incorporation of vendor technical information into plant procedures is addressed primarily by two administrative procedures at VEGP.

Procedure 00108-C, "Control, Review, Approval, and Use of Vendor Documents and Revisions" applies to vendor-supplied drawings, specifications, service letters, equipment-specific correspondence, general publications, and manuals. This procedure ensures that vendor documents are reviewed, approved, and incorporated as necessary into plant procedures. Specifically:

- a. Original copies of vendor documents received on site which address plant equipment are required to be forwarded to the Document Control Department for processing.
- b. Vendor documents are routed to the appropriate departments for review. The documents must be approved by the Engineering Support Department prior to being used. After review the documents are returned to Document Control.

ENCLOSURE (Continued)

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
GENERIC LETTER 83-28 ITEM 2.2.2.

- c. Once a vendor document is approved, a procedure reference sheet is sent to the appropriate departments. Department heads are responsible for writing or revising procedures as necessary and returning an updated procedure reference sheet to Document Control. The reference sheet is retained in the vendor document master file.
- d. When vendor documents are revised, superceded, or voided, procedures must be changed as necessary and the procedure reference sheets updated.

Procedure 00414-C, "Operating Experience Program", assures that operating experience information pertinent to plant safety and reliable operation is supplied to appropriate personnel and incorporated into plant procedures and programs as needed. This procedure applies to INPO Significant Event Reports (SERs), Significant Operating Experience Reports (SOERs), and Operations and Maintenance Reminders (O&MRs). It is also applicable to NRC issuances, Licensee Event Reports, vendor reports such as Westinghouse Technical Bulletins, and in-house operating experiences. Procedure 00414-C requires the following:

- a. Operating experience information is screened for applicability to VEGP. Significant experiences are evaluated to determine if corrective or preventive actions are necessary. These actions can include revisions to procedures, training programs, or administrative programs, or changes to plant design.
- b. Completed evaluations are forwarded to the affected departments for review and concurrence. Once approval is obtained, required actions are tracked to ensure implementation is completed.
- c. Significant experiences which could call for urgent action are forwarded directly to the affected department. A preliminary evaluation may be performed and immediate action taken as necessary.

2. STAFF REQUEST

"The licensee should describe the formal interface programs that have been or will be established with its NSSS, diesel generator, and major safety-related electrical switchgear vendors."

ENCLOSURE (Continued)

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
GENERIC LETTER 83-28 ITEM 2.2.2.

RESPONSE

Formal interface with Westinghouse is accomplished through a General Services Agreement which provides the services of a Westinghouse Project Manager, Project Engineer, and Site Services Manager. GPC participates in Westinghouse Owners Group Activities and programs as well as subscribing to the Westinghouse Technical Bulletin Program. Westinghouse Technical Bulletins are processed in accordance with the previously described Administrative Procedure 00414-C, "Operating Experience Program."

GPC is a member of the Transamerica Delaval, Inc. (TDI) Diesel Generator Owners Group and has access to investigative studies and histories of repeated component malfunctions.

Safety-related electrical switchgear vendors for VEGP include Westinghouse, General Electric, and ITE Brown Boveri. Interface with Westinghouse is as described above. Interface with other vendors is discussed in Item 3 of this response.

3. STAFF REQUEST

"The licensee should confirm that a program of informal contact has been established with vendors of other key safety-related equipment."

RESPONSE

Where formal interface programs with vendors do not exist, GPC utilizes the Vendor Equipment Technical Information Program (VETIP), which was developed by the INPO Nuclear Utility Task Action Committee (NUTAC) on Generic Letter 83-28, Item 2.2.2. As discussed in our May 20, 1985 submittal, the VETIP involves the exchange of information among utilities, the NRC, INPO, and vendors. This program is considered to be capable of identifying precursors to Salem-type events and communicating such information to utilities through SERs, SOERs, O&MRs, and Nuclear Network.

ENCLOSURE (Continued)

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
GENERIC LETTER 83-28 ITEM 2.2.2.

4. STAFF REQUEST

"The licensee should describe how its procedures were revised to control and implement the use of the NUTAC/VETIP as a means for compensating for the lack of a direct vendor interface program for safety-related equipment."

RESPONSE

The previously described Administrative Procedure 00414-C, "Operating Experience Program", controls and implements the use of VETIP information.

5. STAFF REQUEST

"The description should also confirm that these revised procedures include means for implementing the program enhancements identified in Section 3.2 of the NUTAC/VETIP Report."

RESPONSE

Section 3.2 of the NUTAC/VETIP Report contains recommended changes to the NPRDS and SEE-IN programs.

Regarding the NPRDS recommendations, GPC uses instruction manuals issued and controlled by INPO to implement this program. These manuals should include any program enhancements considered appropriate by INPO.

With respect to the SEE-IN recommendations, GPC has identified one area where procedure revisions are appropriate. It is suggested in Section 3.2.2 that potential equipment failures which could result from faulty or missing vendor supplied information be reported over Nuclear Network for review by INPO under the SEE-IN Program. This enhancement is not presently implemented at VEGP. GPC will revise administrative procedures to implement this recommendation by March 31, 1988.

ENCLOSURE (Continued)

RESPONSE TO REQUEST ADDITIONAL INFORMATION
GENERIC LETTER 83-28 ITEM 2.2.2.

6. STAFF REQUEST

"The licensee should provide information regarding the control of instructions and quality assurance of vendor-supplied services performed on safety-related equipment."

RESPONSE

Three administrative procedures at VEGP ensure that adequate control is maintained over instructions and quality assurance of vendor-supplied services performed on safety-related equipment.

Procedure 00203-C, "Requisition Review for Technical and Quality Requirements" requires that procurement documents be reviewed for technical adequacy and quality requirements.

Procedure 0800-C, "Requisition of Materials and Services" contains a services checklist which must be completed when services are being procured. The services checklist requires confirmation that the services will be performed under GPC's QA program or a vendor QA program approved by GPC. The checklist also requires confirmation that the cognizant GPC individual is aware of procedural requirements regarding (a) contractor supplied measuring and testing equipment, (b) approval and/or incorporation of contractor procedures to be used on site, (c) general badging and personnel testing required of contractor personnel, and (d) contractor personnel qualification. The services checklist is required to be attached to the requisition for the services.

Procedure 00801-C, "Control of Onsite Contractors," defines the controls required on instructions and quality assurance for vendor-supplied services. This procedure requires that vendor procedures be reviewed and approved by GPC. It also requires that vendor services be performed in accordance with GPC's QA program or a GPC-approved vendor QA program. This procedure requires that the cognizant GPC individual complete a QA program checklist and/or a QA procedures checklist to document the QA controls which are to be applied to the vendor services.