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**Vogtle Project**

June 9, 1987

Mr. Victor Stello, Jr.  
Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Office of Public Affairs  
Washington, D.C. 20555

Re: Vogtle Electric Generating Plant, Unit 1; 50-424  
Vogtle Unit 1 Readiness Review Pilot Program  
SECY-87-114  
File: X7BD102 Log: GN-1376

Dear Mr. Stello:

Georgia Power Company has received your report to the Commissioners, dated May 5, 1987, assessing the pilot Readiness Review Program conducted at Vogtle Unit 1. We thank you for your courtesy in providing us with a copy of that report and with an opportunity to comment on its contents.

As stated in your report to the Commission, the pilot Readiness Review Program conducted at Vogtle required the expenditure of substantial resources, both on our part and on the part of the Commission. We strongly agree with your conclusion that the Program was worthwhile and that the expenditure of time, effort, and funds early in the licensing process resulted in substantial later savings through stability, predictability, and the absence of delay. As noted in your report, both Georgia Power Company and the Commission have concluded that the success of the Unit 1 Readiness Review effort warrants a continuation of the Readiness Review Program for Vogtle Unit 2, which is scheduled to load fuel on February 28, 1989.

Your May 5, 1987, Assessment contains a number of suggestions for improvement in the Readiness Review effort. Some of these suggestions include: earlier NRC involvement in the planning process; on-going reviews, particularly in the operational areas; parallel formatting with the FSAR; closer coordination of schedules for module submission

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to the Commission for review; and increased emphasis on hardware and product-oriented reviews. Most of these comments and suggestions have been the subject of previous discussions between members of your staff and GPC management. We wholeheartedly agree that the Unit 1 Pilot Program has identified a number of actions to improve and streamline the Readiness Review process. These actions will be discussed with Commission representatives during the on-going planning process for the Vogtle Unit 2 Readiness Review and, where appropriate and practical, incorporated into the Unit 2 effort.

In general, Georgia Power Company agrees with the findings, recommendations, and conclusions in SECY-87-114, "Assessment of Georgia Power Company Vogtle Unit 1 Readiness Review Pilot Program". We did identify the following areas where clarification or editorial corrections are in order to prevent possible misunderstanding. The report states on Page 9, Section 3.a.(1) of the enclosure, in part, that most of the 47 Level I findings impacted Vogtle Unit 1 hardware. Georgia Power Company's analysis shows that only about one-third of the Level I findings required correction to plant hardware. This clarification does not change the conclusion that early identification and timely resolution of problems were major benefits of the program. On Pages 11 and 12, Section 3.a.(6) of the report enclosure, the Assessment indicates that our initial estimate and actual cost of performing the necessary corrective actions was approximately \$15M and \$30M respectively. The figures referred to are actually related to the total cost of all Readiness Review Program activities and the corrective action expenditures account for only a small percentage of the total amount spent.

As noted above, our comments on the Assessment are, in the main, editorial. We are well satisfied with the results of the Readiness Review effort, believe that it is an important tool allowing us to carefully evaluate the overall readiness for operation of Vogtle Unit 1, and have carried the Readiness Review concept over to Vogtle Unit 2.

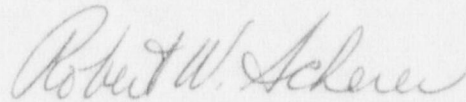
We hope you will find our comments helpful in publication of the Assessment as a NUREG. As always, Georgia Power Company is prepared to provide you with any additional information or assistance which you may require and, if you feel it is appropriate, we are willing to meet with the NRC or others to discuss our experience with the Readiness Review Program. If you need any additional information, please contact me or the Vice President and Vogtle Project Director, Paul D. Rice, directly. I can be reached at 404/526-7786. Mr. Rice can be contacted at the Vogtle Project at 404/722-7535.

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Georgia Power Company is, and will remain, a responsible and responsive licensee and is dedicated to constructing and operating its nuclear facilities in the safest and most effective manner possible. We believe that the Readiness Review Program assists us in meeting these objectives, and appreciate the support given us by the Commission in developing and implementing this Program.

Very truly yours,



Robert W. Scherer  
Chairman and Chief Executive Officer

PDR/CWW:jc

xc: Dr. J. Nelson Grace - NRC Region II  
Mr. Luis Reyes - NRC Region II  
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