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X7GJ17-V120

July 23, 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 INSPECTION REPORT

Gentlemen:

Pursuant to the provisions of 10 CFR 2.201, Georgia Power Company (GPC) submits the enclosed information in response to NRC Inspection Report 50-424/87-35, which concerns the inspection conducted by Messrs. R. E. Weddington and G. B. Kuzo of NRC Region II on May 18-22, 1987. Two apparent violations were cited in the Notice of Violation included in the subject inspection report. A copy of this response is being provided to the NRC Region II office.

In each enclosure, transcription of the NRC violation precedes GPC's response.

Should you have any questions in this regard, please contact this office at any time.

Sincerely,

*William S. Brun* / for  
L. T. Gucwa

JL/lm

Enclosures:

1. Violation 87-35-01 and GPC Response
2. Violation 87-35-02 and GPC Response

c: (see next page)

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c: Georgia Power Company

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U. S. Nuclear Regulatory Commission

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ENCLOSURE 1

PLANT VOGTLE -- UNIT 1  
NRC DOCKET 50-424  
OPERATING LICENSE NPF-68  
NRC NOTICE OF VIOLATION 87-35-01 AND GPC RESPONSE

VIOLATION 50-424/87-35-01:

"10 CFR 20.201(b) requires the licensee to make or cause to be made such surveys as may be necessary for the licensee to comply with the regulations in Part 20 and are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

Final Safety Analysis Report (FSAR) Section 1.9.68.1 and 14.2.3(g) commits the licensee to conform with Regulatory Guide (RG) 1.68, Initial Test Programs for Water Cooled Nuclear Plants, August 1978.

RG 1.68, Appendix A, Section 5.b.b requires the performance of neutron and gamma radiation surveys at 50 and 100% power levels to establish the adequacy of shielding and to identify high radiation zones as defined in 10 CFR Part 20, Standards for Protection Against Radiation.

Contrary to the above, surveys in Unit 1 for the 50% power level conducted during the period April 16-18, 1987, were not adequate to establish the adequacy of shielding in that:

1. Vertical shield areas both within and outside of Unit 1 containment were not comprehensively scanned between radiation base points.
2. Surveys of horizontal shield sections both within and outside of containment were not performed.
3. Survey measurements performed were not extrapolated to rated full power.

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

RESPONSE TO VIOLATION 50-424/87-35-01:

Admission or Denial of Alleged Violation:

This event occurred substantially as stated in the Inspection Report.



NRC NOTICE OF VIOLATION 87-35-01 AND GPC RESPONSEAdmission or Denial of Alleged Violation (Continued):

After careful and considered review of the severity categories listed in Supplement IV to 10 CFR Part 2, Appendix C, and additional review of the event, Georgia Power Company (GPC) believes that a more appropriate severity classification is Severity Level V - violations that have minor safety or environmental significance.

GPC has no formal commitment to ANSI/ANS 6.3.1 - 1980. Radiation base points (RBP) and the survey methodology were chosen based on an assessment of the FSAR requirements, the radiation zone maps in the FSAR, utility experience, and current literature. We believe that the Vogtle Electric Generating Plant (VEGP) radiation survey procedures which were employed in the subject surveys were adequate to establish and identify radiation zones for protection of personnel against radiation in accordance with 10 CFR 20.201(b). Thus, our deviation from the ANSI standard was, we believe, of minor safety significance.

It should be noted that exception was taken at the inspectors' exit to this violation. This is not reflected in the Inspection Report.

Based upon the foregoing information, VEGP requests a downgrade in Severity Level to Severity Level V.

Reason for Violation:

GPC has no formal commitment to ANSI/ANS 6.3.1 - 1980, thus no commitment to detailed implementation of specified recommendations for surveys conducted. Plant personnel did not incorporate provisions of this standard when choosing the methodology for the conduct of radiation surveys.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

The NRC inspectors' recommendation of using the improved methodology described in the aforementioned ANSI standard was incorporated into the 100% power survey portion of Startup Test Procedure 1-600-05 "Radiological Shield Survey". The Startup Test Procedure for Unit 2 radiological shield survey will include the recommendations as specified in ANSI/ANS 6.3.1 - 1980.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved with the 100% power level radiological shield survey which was completed on May 29, 1987. No major shielding deficiencies were identified.

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ENCLOSURE 2

PLANT VOGTLE - UNIT 1  
NRC DOCKET 50-424  
OPERATING LICENSE NPF-68  
NRC NOTICE OF VIOLATION 87-35-02 AND GPC RESPONSE

VIOLATION 50-424/87-35-02:

"10 CFR 50, Appendix B, Criterion XVI requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected. The identification of significant conditions adverse to quality, the cause of the condition, and the corrective action taken shall be documented and reported to appropriate levels of management.

FSAR Section 17.2.16 states that approved plant procedures shall be written to ensure that conditions adverse to quality, failures, malfunctions, deficiencies, defective materials and equipment and nonconformances on safety-related systems are promptly identified, documented, and corrected.

Procedure 00150-C, Deficiency Control, Revision 5, February 20, 1987, describes the use of Deficiency Cards to document problems, including radiological deficiencies.

Contrary to the above, the licensee failed to adequately document the identification and corrective actions for a condition adverse to quality on Deficiency Card 1-87-948, written in response to a radiological event in the Unit 1 containment on March 18, 1987, during flux mapping, in that the circumstances of the event were not fully described, related relevant documents and information were not included in the record and corrective actions taken to correct the problem were not documented.

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

RESPONSE TO VIOLATION 50-424/87-35-02:

Admission or Denial of Alleged Violation:

The event occurred as stated in the Inspection Report.

Reason for Violation:

Confusion regarding the reporting and documentation of radiological deficiencies was caused by the existence of two procedures which could be

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## ENCLOSURE 2 (Continued)

NRC NOTICE OF VIOLATION 87-35-02 AND GPC RESPONSEReason for Violation (Continued):

used for reporting of such events. Procedure 00150-C "Deficiency Control" and Procedure 00911-C "Radiological Deficiencies, Occurrences and Incidents" both provide for the reporting and documentation of radiological deficiencies. Health Physics (HP) personnel failed to initiate a Radiological Occurrence Report (ROR) in accordance with procedure 00911-C when the deficiency was identified. Had an ROR been initiated, as was assumed by Nuclear Safety and Compliance (NSAC) personnel, an adequate evaluation and documentation of the radiological event would have been made.

NSAC personnel evaluated deficiency card (DC) 1-87-948 in accordance with procedure 00150-C "Deficiency Control" for event significance and reportability. The event was evaluated based on their determination that HP personnel had been notified of the movement of the incore detectors and that no significant radiological exposure had occurred. Further, the NSAC personnel assumed that the radiological significance would be evaluated under 00911-C. The significance of the radiological event was not, therefore, evaluated when DC 1-87-948 was reviewed to determine if a Significant Occurrence Report (SOR) should be initiated. Thus, the event was considered non-significant, and no SOR was initiated to document root cause evaluation and determination of corrective action.

Corrective Steps Which Have Been Taken and Results Achieved:

The NSAC and HP staffs now coordinate the evaluation of radiological deficiencies to ensure that either an ROR or SOR is initiated when appropriate.

The posting of the seal table room and adjacent areas as radiation areas, which were subject of the DC, was accomplished in accordance with 10 CFR 20. The HP superintendent has briefed the HP foremen and technicians regarding this incident and procedural requirements for reporting and documenting radiological deficiencies.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

A revision to Procedure 00150-C will be made to provide further clarification of the proper treatment of radiological deficiencies. The

ENCLOSURE 2 (Continued)

NRC NOTICE OF VIOLATION 87-35-02 AND GPC RESPONSE

Corrective Steps Which Will Be Taken to Avoid Further Violations (Continued):

revision is expected to be completed by September 30, 1987. Training of plant personnel on the procedure revision is expected to be completed by October 21, 1987. Procedure 00911-C will then be voided. To prevent confusion from the overlap of these procedures in the interim time period, additional instruction will be provided to the HP technicians regarding procedural requirements for evaluation of radiological deficiencies.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved with the posting of the seal table room. Additional instructional sessions with HP personnel will be completed by July 24, 1987.