

J. D. Woodard
Executive Vice President

**Southern Nuclear
Operating Company, Inc.**
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Tel 205.992.5086



Energy to Serve Your World™

LCV-1234-A

July 13, 1998

Docket Nos. 50-424
50-425

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

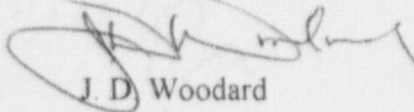
Ladies and Gentlemen:

**VOGTLE ELECTRIC GENERATING PLANT
REPLY TO A NOTICE OF VIOLATION**

Pursuant to 10 CFR 2.201, Southern Nuclear Operating Company submits the enclosed information in response to two violations identified in Inspection Reports 50-424,425/98-04 concerning an inspection conducted from April 19 through May 16, 1998.

Please contact this office if you have any questions.

Sincerely,



J. D. Woodard

JDW/BHW

Enclosure: Reply to a NOV 50-424,425/98-04

xc: Southern Nuclear Operating Company

Mr. J. B. Beasley

Mr. M. Sheibani

SNC Document Management

U. S. Nuclear Regulatory Commission

Mr. L. A. Reyes, Regional Administrator

Mr. D. H. Jaffe, Senior Project Manager, NRR

Mr. J. Zeiler, Senior Resident Inspector, Vogtle

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G PDR

ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO A NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424;425/98-04

VIOLATION A, 50-424;425/98-04-01

The following is a transcription of the violation as cited in the Notice of Violation (NOV):

"During an NRC inspection conducted April 19, 1998, through May 16, 1998, violations of NRC requirements were identified. In accordance with the 'General Statement of Policy and Procedure for NRC Enforcement Actions,' (NUREG 1600), the violations are listed below:

- A. Technical Specifications 5.4.1.a requires that written procedures be implemented for the activities identified in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, which includes administrative procedures for personnel compliance with plant procedures.

Operations Administrative Procedure 00054-C, 'Rules For Performing Procedures,' Revision 11, provides instructions for performing activities in accordance with approved procedures. This procedure requires that plant procedure steps be performed in sequence unless special circumstances warrant or deviations are allowed by the procedure. The procedure further states that the Unit Shift Supervisor (USS) may allow procedure steps to be performed out of sequence if it does not result in the omission of required work, violate the intent of the procedure, or create an unsafe plant condition.

Startup Operating Procedure 12001-C, 'Unit Heatup to Hot Shutdown (Mode 5 to Mode 4)', Revision 38, Step A4.2.3.b, requires that, while the reactor coolant system (RCS) is in a water solid condition, ensure all letdown orifice isolation valves remain open.

Contrary to the above, on April 15, 1998, upon identification that one of the three letdown orifice isolation valves would not open, the Unit 2 USS proceeded to allow operation of the unit in water solid conditions with only two of three letdown orifice isolation valves in the prescribed position. The third letdown orifice isolation valve was opened on April 17 following maintenance repairs.

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

RESPONSE TO VIOLATION A (50-424;425/98-04-01)

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VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO A NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424;425/98-04

Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

Reason for the Violation:

On April 15, 1998, during a reactor startup following a Unit 2 refueling outage, operations personnel were preparing to enter water solid operation. In accordance with the requirements of procedure 12001-C, "Unit Heatup to Hot Shutdown (Mode 5 to Mode 4)", while the reactor coolant system is in a water solid condition, the three letdown orifice isolation valves will remain open. Personnel were unable to open one of the three letdown orifice isolation valves. Subsequently, based on plant conditions, the unit shift supervisor (USS) made a decision to enter water solid operations with one valve closed. The USS noted in the procedure that the valve could not be opened and initiated a work request to have the valve repaired.

The decision to enter water solid operation with one letdown orifice isolation valve closed resulted from a failure to recognize that having all three letdown orifice isolation valves open was a FSAR requirement. Because this was not recognized as a FSAR requirement, shift supervision and plant management did not consider entering water solid operations with one letdown orifice isolation valve closed to be a change in the intent of the unit operating procedure (12001-C.) Procedure 00054-C, allows under certain circumstances, the USS to perform procedure steps out of sequence as long as it does not violate the intent of the procedure.

This violation was a result of personnel error, in that, shift supervision and plant management did not fully understand the requirement of having all three letdown orifice isolation valves open with the plant in a water solid condition.

Corrective Steps Which Have Been Taken and the Results Achieved:

1. On April 17, 1998, the valve that would not open was repaired and opened.
2. Personnel involved were counseled on procedure performance and applying the guidance in procedure 00054-C.
3. This event has been included in the licensed operator requalification program.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

1. Procedure 12001-C, will be revised to provide clear direction to ensure that all three letdown orifice isolation valves are open when entering water solid conditions. This will be completed by July 30, 1998.

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2. Operations shift briefings will be conducted on this event, particularly on applying the guidance provided in procedure 00054-C. This will be completed by July 21, 1998.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on April 17, 1998, when the valve that would not open was repaired and subsequently opened.

VIOLATION B, 50-424;425/98-04-03

The following is a transcription of the violation as cited in the Notice of Violation (NOV):

- "B. 10 CFR 50, (Code of Federal Regulation) Appendix R, Criterion V, Instructions, Procedures, and Drawings, requires, in part, that activities affecting quality be prescribed and accomplished in accordance with procedures appropriate to the circumstances.

Procedure 00254-C, 'Foreign Material Exclusion and Plant Housekeeping Programs,' Revision 18, requires that tools, equipment, and material entering and leaving a designated Zone II, foreign material exclusion area be logged on the foreign material exclusion inventory log forms.

Contrary to the above, on April 28, 1998, approximately eight miscellaneous tools, equipment, and materials were identified inside the designated Zone II area around the Unit 1 and Unit 2 spent fuel pools that were not logged on the foreign material exclusion inventory form. Further, one item was identified as being inside the Zone II area (via an open inventory form line item) that had been removed five days earlier. The licensee failed to log out the item in accordance with procedure requirements.

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

RESPONSE TO VIOLATION B (50-424;425/98-04-03)

Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

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VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO A NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424;425/98-04

Reason for the Violation:

Due to personnel error, on April 28, 1998, various materials inside the Units 1 and 2 Spent Fuel Pool (SFP) Zone II areas were not being controlled in accordance with the requirements of procedure 00254-C. Personnel from various departments performing work activities in the Zone II areas failed to properly control material in accordance with the applicable foreign material exclusion (FME) procedural requirements.

A contributing factor to this violation involved the vagueness of certain procedural requirements in procedure 00254-C.

Corrective Steps Which Have Been Taken and the Results Achieved:

1. Items that could not be accounted for on the Zone II logs were immediately removed.
2. As an interim measure until final corrective steps are complete, the SFP Zone II area is manned continuously to control access and ensure total compliance with current procedural requirements.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

1. Procedure 00254-C, will be revised to clarify procedural requirements for maintaining FME controls in Zone II areas. This will be completed by July 30, 1998.
2. Subsequent to the revision of procedure 00254-C, appropriate personnel will receive training on the new procedural requirements for maintaining Zone II FME controls. This will be completed by September 1, 1998.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on April 28, 1998, when the items that could not be accounted for on the Zone II logs were immediately removed.