

OFFICIAL

July 10, 1989

Georgia Power Company
ATTN: Mr. W. G. Hairston, III
Senior Vice President -
Nuclear Operations
P. O. Box 1295
Birmingham, AL 35201

Gentlemen:

SUBJECT: REPORT NO. 50-424/89-13

Thank you for your response of June 14, 1989, to our Notice of Violation, issued on May 15, 1989, concerning activities conducted at your Vogtle facility. We have evaluated your response and found that it meets the requirements of 10 CFR 2.201.

However, we disagree with your reasoning for denial of example two of violation 50-424/89-13-01. Specifically, the basis of our disagreement is your statement that "the training was provided during Licensed Operator Requalification Training during 1988 Requal Segment 88-07. This training used LO-LP-35205 Revision 2, which was in effect from 9/30/88 through 2/21/89. This lesson plan included information relating to the use of the Technical Specification (TS) cooldown curves (including instruments used)." Lesson plan LO-LP-35205 Revision 2 did have hand written information which addressed the new changes to the TS cooldown curve, but the TS graphs in the training material depicting the cooldown limits did not contain the current TS cooldown curve information, i.e., which instrument/s were to be used during cooldown. Furthermore, your contention that "once training is complete and changes are incorporated into plant documents or the plant, training on that particular item is no longer needed", is not acceptable. In this particular situation, subsequent training would have been conducted using lesson plan LO-LP-35205 Revision 3. This lesson plan contained the same cooldown curves as revision 2, hence incorrect TS cooldown graphs would have been utilized. These graphs did not contain information as to which instruments were to be used. Therefore, the second example of the above violation is still considered valid. However, during the inspection adequate corrective actions were implemented and issued in requalification lesson plan, LO-LP-35205-04. This item is considered closed and no further response is necessary.

Additionally, Georgia Power Company GPC offered information in mitigation of the conclusion drawn with regard to example one and three of Violation 424/89-13-01, which was that the Corrective Action Program is ineffective. Your presentation explained that while 100 percent compliance has not been achieved with the required reading program, the reading program has undergone several evolutions since its original conception and many weaknesses noted by both the NRC and the licensee have been addressed and corrected. This explanation, though reasonable, is not sufficient reason for mitigation. In addition, the repetitiveness of missed reviews of the required reading book coupled with the fact that the responsible supervisors were unaware that some individuals were repeat offenders causes concern about the adequacy of your corrective action program to prevent recurrence.

8907190397 890710
PDR ADDCK 05000424
Q PNU

IE01 110

We will examine the implementation of your corrective actions during future inspections. We appreciate your cooperation in this matter.

Sincerely,

(ORIGINAL SIGNED BY E. W. MERSCHOFF FOR)

Albert F. Gibson, Director
Division of Reactor Safety

cc: R. P. McDonald, Executive Vice
President-Nuclear Operations
C. K. McCoy, Vice President-Nuclear
G. R. Fredrick, Quality Assurance
Site Manager
G. Rockhold, Jr., General Manager
Nuclear Operations
J. A. Bailey, Manager-Licensing
B. W. Churchill, Esquire, Shaw,
Pittman, Potts, and Trowbridge
J. E. Joiner, Esquire, Trotman,
Sanders, Lockerman, and
Ashmore
D. Kirkland, III, Counsel,
Office of the Consumer's Utility
Council
State of Georgia

bcc: E. Reis, OGC
J. Hopkins, NRR
M. Sinkule, RII
NRC Resident Inspector
✓ Document Control Desk

RII

BBreslau:obw
06/21/89

RII

PKelllogg
06/22/89

RII

TPeebles
06/28/89

~~RII/DRS~~

AFGibson
07/10/89