

Georgia Power Company
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USNRC REGION I
ATLANTA, GEORGIA

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W. E. Ehrensperger
Senior Vice President
Power Supply

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June 15, 1979

Mr. James P. O'Reilly, Director
United States Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: Enforcement Inspection Report Nos. 50-424/
79-10 and 50-425/79-10

The attached is in response to your May 25, 1979 letter and confirms the information provided to your staff during a June 13, 1979 meeting at the NRC Region II office relative to that letter.

We appreciated the opportunity to meet and offer our clarifications to the inspection and enforcement issues that have recently been raised concerning the Vogtle Nuclear Plant. Both the June 13 and the earlier May 22 meeting referred to in your May 25 letter were, we believe, beneficial exchanges that will lead to better assurances on behalf of all concerned that the Vogtle facility is being constructed in accordance with all applicable requirements.

This reply contains no proprietary information and may be placed in the NRC's Public Document Rooms upon receipt.

Very truly yours,

W. E. Ehrensperger
W. E. Ehrensperger

WEE:db

Attachment

cc: J. H. Miller, Jr. D. E. Dutton
R. E. Conway K. M. Gillespie
R. J. Kelly E. D. Groover
F. G. Mitchell, Jr. L. T. Gucwa
R. A. Thomas C. W. Hayes
C. F. Whitmer M. Z. Jeric
J. A. Bailey R. W. Staffa

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The following is Georgia Power Company's response to Mr. James P. O'Reilly's May 25, 1979 letter and confirms information provided to his staff during May 22, 1979 and June 13, 1979 meetings in the NRC Region II office:

1. Corporate QA Direction:

- (a) The attached QA/QC notice from Georgia Power Company's president, Mr. R. W. Scherer, has been posted at the Vogtle jobsite. This notice emphasizes QA/QC responsibilities and establishes the "Hot-Line" mechanism requested by the Commission to have construction problems directed to GPC top management.
- (b) The attached June 8, 1979 notice from the Vogtle Project General Manager to the Managers of QA and Construction for the Vogtle Project reaffirms and reenforces the "Stop Work" authority of both QA and QC personnel.

2. PSAR Requirements:

As discussed in the NRC Region II office during our meetings of May 22 and June 13, 1979, we have a continuing program within the Vogtle design operations to assure that our construction specifications, drawings and procedures comply with the provisions of the Preliminary Safety Analysis Report (PSAR). Inasmuch as the PSAR does not contain final information in many instances while in others containing typical details and superseded codes and standards, it may require clarifications where more definitive or updated information is developed in our construction specifications, drawings, etc. that is different than the PSAR itself. In answer to the NRC's request to study and resolve these differences, we conducted a very rigorous review within the civil area of the PSAR as related to concrete work and reviewed a compilation of the results at the June 13 meeting. We found that in every case the differences were equivalent or better to the original provisions of the PSAR. Further, limited reviews of differences have been initiated for the other disciplines cited in the NRC's May 25 letter, the results of which were discussed at the June 13 meeting. Again, the clarifications presented showed that in all cases the differences were equivalent or better than provided in the PSAR.

As a matter of practice and enforcement of applicable portions of several project procedures and through good engineering judgment, all differences, before implementation, are evaluated and categorized as to their significance ranging from mere evolution of design details to those differences that warrant a formal change to the PSAR via a supplement, amendment, etc. transmitted to the NRC's Licensing organization. The substantive differences not submitted as formal changes to the PSAR will be incorporated into the FSAR. Furthermore, our work on the FSAR is scheduled to commence in July 1979 with a first working draft available in early 1980 - this effort, as indicated above, is the formal process for collection and notification of changes to the PSAR.

In conclusion and as discussed with the NRC's Region II staff, we do not plan to develop a comprehensive compilation of all differences for all disciplines at this time apart from our FSAR work. Rather, since the differences are available in other approved engineering documentation, any necessary clarifications or justifications will be provided to Region II Inspection and Enforcement

personnel upon request during their audits of the Vogtle facility. This information will be available on an as-required basis through the site resident representatives of our central design organization.

3. Training:

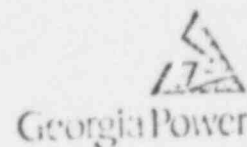
We do have a very comprehensive training program established at the Vogtle job-site. This program has primarily been oriented toward assuring that our inspection personnel are knowledgeable and certified commensurate with the areas for which they are responsible. Planning was initiated some time ago for expanding the program to include QA/QC program training of our site contractor personnel involved in all areas of the work. The program will include indoctrination on all phases of QA/QC for these personnel to strengthen our commitment and their understanding that QA and QC are Project-wide policies not just restricted to limited areas of the work. The expanded program is expected to commence within six to eight weeks.

We would like to reaffirm that our commitment to total Quality Assurance is of continuing concern to the corporate management of Georgia Power Company as evidenced by the activities listed below and discussed with your staff during our May 22, 1979 and June 13, 1979 meetings:

- A. Project Management Board - As discussed in Chapter 17 of the PSAR, the Project Management for Plant Vogtle is headed by a Project Management Board. Each month, the Project General Manager (also discussed in Chapter 17 of the PSAR) reports on the status of QA Audit Findings whether generated internally or as a result of an NRC I&E Inspection. In addition, top management serving on the Board also receives monthly reports of all open QA items. These mechanisms enable them to monitor the QA program on a continuing basis, establish priorities and initiate corrective action as necessary. Their direction is implemented through the Project General Manager to the remaining portion of the Project organization.
- B. Quality Assurance Committee - The Quality Assurance Committee, again as described in Chapter 17 of the PSAR, meets throughout each year for the sole purpose of reviewing the QA/QC program status of all plants including Plant Vogtle.
- C. Site Visits - In addition to the items listed above, periodic visits are made to the jobsite by the Project General Manager, Project Executive and other top management personnel specifically to review QA program status and implementation.

We have a very positive program that subjects all activities to rigorous reviews and are confident that Plant Vogtle will be constructed in accordance with applicable NRC regulations.

H. V. Scherer
President



N O T I C E

(ALL PERSONNEL - GEORGIA POWER COMPANY & CONTRACTOR)

Plant Vogtle is being constructed in accordance with a Quality Assurance Program which complies with the Code of Federal Regulations, Title 10, Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants." This program is implemented through manuals, procedures, drawings, and instructions which must be followed to assure a safe, reliable plant. For the program to be successful it requires the support and cooperation of all personnel working on site whether they be employees of Georgia Power Company or one of its contractors.

Many Georgia Power Company and contractor employees have been assigned specific tasks to ensure that all parties carry out the quality assurance and quality control functions of the program. These Quality Assurance and Quality Control personnel will be monitoring, inspecting, and auditing our work. All employees have an individual responsibility to assure that their work is done in a workmanlike, quality manner in accordance with approved drawings and procedures. And, each level of supervision is responsible to see that all those working for him are given the proper instructions to enable them to carry out the program.

Anyone who is not sure of his responsibilities or is not provided adequate approved procedures or instructions should notify his supervisor. If at any time you are aware of any work or believe you are being directed to work in a manner that is in violation of approved procedures or policies, you should discuss this matter with the next level of supervision. If you believe site supervision is not responsive to your concerns or you are concerned about retaliation by site supervision, you should call Mr. R. W. Staffa, the Georgia Power Company Corporate Quality Assurance Manager at extension 2867 in the Georgia Power Company General Office, Atlanta, Georgia. All calls will be held in strict confidence and will be investigated and reviewed with upper management.

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H. V. Scherer
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Vogtle Project

Southern Company Services, Inc.
Post Office Box 2625
Birmingham, Alabama 35202
Telephone 205 870-6011

DATE: June 8, 1979

RE: Plant Vogtle - Units 1 & 2
Quality Assurance/Quality Control Authority
File: ~~X7BG01~~, X7BG02
Log: G-4150

TO: K. M. Gillespie
J. W. Hayes

I have reviewed the commitments of the PSAR, QAM, and Field Procedure Manual outlining the authority and duties of Quality Assurance and Quality Control. These manuals adequately detail the requirements and controls that must be implemented to assure a safe reliable plant. The stop work authority of both QA and QC is clearly defined in Section 17.1.1 of the PSAR, Section I of the QAM, and Field Procedure GD-T-07.

To highlight the importance of QA/QC, and to reinforce the QA/QC authority outlined in the above documents, I am requesting that the QA/QC duties and authorities be given added emphasis in future craft orientation and training programs. This training, among other things, should emphasize that both QA and QC have "stop work" authority. Craft orientations should also stress the importance of each individual following the policies and procedures established. Each individual should realize the importance of complying with the QA Program and understand that GPC top management is committed to the program.

Doug Dutton
Project General Manager

DED/aaw

xc: W. E. Ehrensperger
R. E. Conway
J. H. Miller, Jr.
R. W. Staffa
D. M. Fiquett
E. D. Groover
R. R. Allen

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