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January 16, 1990

the southern electric system

W. G. Hairston, III
Senior Vice President
Nuclear Operations

ELV-01232
0201

Docket Nos. 50-424
50-425

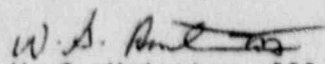
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

VOGTLE ELECTRIC GENERATING PLANT
REPLY TO A NOTICE OF VIOLATION

Pursuant to 10 CFR 2.201, Georgia Power Company (GPC) submits the enclosed information in response to Inspection Report 50-424/89-31 and 50-425/89-36 which concerns the inspection conducted by Mr. S. G. Tingen of the NRC from October 30 - November 3, 1989 and November 13 - 17, 1989. In the enclosure, transcription of the violation precedes GPC's response.

Please contact this office if you have any questions.

Sincerely,


W. G. Hairston, III

WGH,III/NJS/gm

Enclosure: Violations 50-424/89-31-01 and 50-425/89-36-01 and GPC Response

c(w): Georgia Power Company
Mr. C. K. McCoy
Mr. G. Bockhold, Jr.
Mr. P. D. Rushton
Mr. R. M. Odom
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebnetter, Regional Administrator
Mr. J. B. Hopkins, Licensing Project Manager, NRR
Mr. R. F. Aiello, Senior Resident Inspector, Vogtle

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ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2
NRC NOTICE OF VIOLATIONS 424/89-31-01 AND 425/89-36-01 AND GPC RESPONSE

"Technical Specification 4.4.4.1 requires each Power Operated Relief Valve (PORV) to be demonstrated operable at least once every 18 months by performance of a channel calibration and operating the valve through one cycle of full travel. A channel calibration is required to encompass the entire channel including sensors and alarm, interlock and/or trip functions such that the entire channel is calibrated.

Contrary to the above, PORV channel calibrations did not fully test the portions of both the PORV channels that actuate automatically on a pressurizer high pressure signal. As such, the entire PORV channel was not calibrated.

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

RESPONSE TO VIOLATIONS 50-424/89-31-01 AND 50-425/89-36-01

Admission or Denial of the Violations:

Georgia Power Company denies the violations.

Georgia Power Company does not agree that automatic opening of the pressurizer PORV is required to be tested for the following reasons:

- a. Automatic PORV operation is not assumed for accident mitigation in the safety analyses. Thus, PORV operability is not dependent on the automatic opening of the PORV. PORVs are not required for overpressure protection. Consequently, automatic operation of the PORVs is not required and surveillance testing of the manual portion of the PORV control circuit is sufficient to meet Technical Specification requirements.
- b. Furthermore, action statement a. of Technical Specification 3.4.4 allows indefinite operation with both PORV block valves closed in the event of excessive seat leakage. Closing of the block valves precludes automatic operation of the PORVs. Consequently, the Technical Specifications acknowledge reactor operation without the automatic portion of the PORV control circuit.
- c. Moreover, for several accident conditions the PORVs are operated in the manual mode. Emergency procedures provide direction to the operators for operation of the PORVs. Consequently, the manual control circuit for the PORVs is relied on to ensure safe operation.

In summary, Georgia Power Company does not consider the automatic portion of the PORV control circuit to be covered by the surveillance requirement. The manual portion of the PORV actuation circuit is covered by the Technical Specifications and is addressed in surveillance test procedures. However, after discussion with the NRC, Georgia Power Company agrees to test the automatic opening portion for these valves at least once per 18 months. Although testing will be performed, it is not considered a requirement to meet Technical Specification requirement 4.4.4.1.

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