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USNRC REGION 1
ATLANTA, GEORGIA

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July 15, 1981



Georgia Power

the southern electric system

J. T. Beckham, Jr.
Vice President and General Manager
Nuclear Generation

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 3100
101 Marietta Street, NW
Atlanta, Georgia 30302

REFERENCE:
RII: RCL
50-321/50-366
Inspection Report 81-07

ATTENTION: Mr. James P. O'Reilly

Gentlemen:

The following information is submitted in response to Inspection Report 81-07 concerning the inspection conducted by D. M. Montgomery of your office on April 27 through May 12, 1981. Two apparent violations were identified.

VIOLATION A:

Technical Specification 6.8.1 requires that written procedures shall be established, implemented and maintained covering procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2. Procedure HNP-7651, which implements Regulatory Guide 1.33, requires that quality control data for chemical analyses be recorded on control charts.

Contrary to the above, Procedure HNP-7651 was not fully implemented in that:

1. precision control data for chloride analysis were not plotted on control charts during the period of May 21, 1980 to January 1, 1981.
2. quality control data for silica analyses were not plotted on control charts during the period of November 19, 1980 to March 22, 1981.

This is a Severity Level V Violation (Supplement I.E).

RESPONSE:

Admission or denial of alleged violation--the violation occurred as stated.

Reason for the violation--the violation has been attributed to personnel error. The foreman in charge was aware that the points had not been plotted and had previously asked the technician responsible for that task to plot the points. The foreman had not rechecked the charts for the points.

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Corrective steps which have been taken and results achieved--the deficiency was corrected prior to the inspector's departure from the plant on April 30, 1981.

Corrective steps which will be taken to avoid future violations--to avoid further violations, the data and control charts will be reviewed weekly by the responsible foreman.

Date when full compliance will be achieved--full compliance was achieved on April 30, 1981.

VIOLATION B:

Environmental Technical Specification 5.6 requires that detailed written procedures, including applicable checklists and instructions, shall be prepared and followed for all activities involved in implementing the Environmental Technical Specifications and that procedures shall apply to sampling data recording and storage, instrument calibration, measurement and data recording and storage, instrument calibration, and measurement and analysis.

Contrary to the above, procedures were not prepared and followed for all activities involved in implementing the Environmental Technical Specifications in that:

1. On April 29, 1981, there were no calibration procedures or calibration program for flow meters associated with the plant vent and reactor building vent sampling systems used to implement Section 2.1.4 of the Environmental Technical Specifications.
2. On April 29, 1981, there was no calibration procedure or calibration program for the pressure gauge used for sampling gases to implement Section 2.1.4 of the Environmental Technical Specifications.

This is a Severity Level V Violation (Supplement I.E).

RESPONSE:

Admission or denial of alleged violations--the violation occurred as stated.

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Reason for the violation--the violation has been attributed to an oversight by supervision. The pressure gauges and flow meters had not been included in the surveillance program for instrument calibration. The flow meters are an integral part of continuous radiation monitoring systems and thereby cannot be easily removed for calibration. The removal of some of the meters would cause the radiation monitoring systems to be out of service, thus resulting in a Licensee Event Report (LER).

Corrective steps which have been taken and results achieved--the pressure gauges were checked for accuracy and were found to be within acceptable limits; this was completed on May 22, 1981. A Design Change Request (DCR) has been initiated to install parallel flow meters on these systems so that the flow meters can be checked without taking the system out of service.

Corrective steps which will be taken to avoid future violations--when the DCR is complete, the present flow meters will be checked for accuracy. An evaluation of the accuracy of the flow and pressure measuring devices will then be made to determine their effect on the accuracy of gaseous effluent monitoring in the past. Additionally, a calibration program for both the pressure gauges and flow meters will be established.

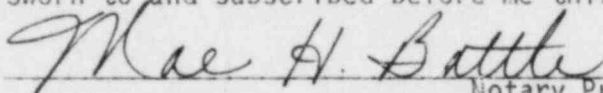
Date when full compliance will be achieved--once a DCR design package is approved for implementation, a completion date will be set.

J. T. Beckham, Jr. states that he is Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that to the best of his knowledge and belief the facts set forth in this letter are true.

GEORGIA POWER COMPANY

By: 
J. T. Beckham, Jr.

Sworn to and subscribed before me this 15th day of July, 1981.



Notary Public, Georgia, State at Large
My Commission Expires Sept. 20, 1983

Notary Public

WHO/nb

xc: M. Manry

R. F. Rogers, III