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February 28, 1991

ELV-02579
0859

Docket No. 50-425

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
REPLY TO A NOTICE OF VIOLATION

Pursuant to 10 CFR 2.201, Georgia Power Company (GPC) submits the enclosed reply to a Notice of Violation as documented in NRC Inspection Report Nos. 50-424/90-32 and 50-425/90-32 which concerns the results of an inspection performed by Mr. B. R. Bonser during the period of December 22, 1990 through January 18, 1991.

Please contact this office if you have any questions.

Sincerely,

W. G. Hairston, III
W. G. Hairston, III

WGH, III/NJS/gm

Enclosures: Violation and GPC Response

c(w): Georgia Power Company
Mr. C. K. McCoy
Mr. W. B. Shipman
Mr. R. M. Odom
Mr. P. D. Rushton
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. O. Ebnetter, Regional Administrator
Mr. D. S. Hood, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

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ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNIT 2
REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-424/90-32 AND 50-425/90-32

"Technical Specification 4.1.3.2 requires that each digital rod position indicator shall be determined to be operable by verifying that the Demand Position Indication System and the Digital Rod Position Indication System agree within 12 steps at least once per 12 hours except during time intervals when the position deviation monitor is inoperable, then compare the Demand Position Indication System and the Digital Rod Position Indication System at least once per 4 hours.

Contrary to the above, the licensee failed to compare the Unit 2 Demand Position System and the Digital Rod Position Indication system at least once per 4 hours after rendering the rod position deviation monitor inoperable on January 2, 1991. The monitor was inoperable from 3:18 p.m. CST on January 2 to 7:45 a.m. CST on January 7, 1991.

This is a Severity Level IV violation and applies to Unit 2 only (Supplement I)."

Admission or Denial of the Violation:

The violation occurred as stated. This event was identified and reported to the NRC by GPC in Licensee Event Report (LER) 50-425/1991-001, dated 2-4-91.

Reason for the Violation:

The violation occurred as a result of a cognitive personnel error on the part of a Balance of Plant (BOP) operator. The BOP operator failed to follow procedure 13504-C, "Proteus Computer," when entering a computer point value into the Proteus computer. The operator should have entered a "1" into the entered value field and into the entry scan field, as required by procedure. The effect of this omission was that the computer point YC0400 (Rod Position Deviation Monitor Alarm) limit and scan function were not returned to service.

A contributing cause was the failure of a relay output circuit card in the interface between the Digital Rod Position Indication (DRPI) and the Proteus computer. The failure was discovered by a plant system engineer several days after the event while investigating the source of rod position values which displayed suspect or bad quality data in the Proteus computer.

Corrective Steps That Have Been Taken and the Results Achieved:

1. The BOP operator has been counseled regarding the importance of procedural compliance.
2. The failed relay output circuit card has been replaced.

ENCLOSURE (CONTINUED)

NRC INSPECTION REPORT NOS. 50-424/90-32 AND 50-425/90-32

3. A Standing Order has been issued which implements administrative controls for Proteus computer operations and will remain in effect until corrective action 1 as identified below is completed.
4. Procedures 17010-1 & 2, "Annunicator Response Procedures for ALB 10 On Panel 1C1 on MCB," and 13504-C, "Proteus Computer," have been revised to provide stricter administrative control of Proteus computer operations. The Proteus computer access codes have been modified to limit the number of individuals with access to change computer parameters.

Corrective Steps That Will Be Taken To Avoid Further Violations:

1. As of 1-28-91, more detail related to the operation of the Proteus computer has been included in licensed operator requalification training. This requalification training cycle will be completed on 3-8-91.
2. Vogtle Electric Generating Plant will implement a routine check (shiftly) of computer generated alarms associated with TS surveillances by 3-29-91.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on 1-7-91 at 0743 CST when the Unit Shift Supervisor was advised of the inoperable condition and the T.S. 4.1.3.2 special condition four hour surveillance for an inoperable rod position deviation monitor was initiated.