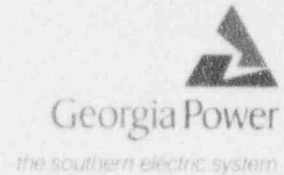


Georgia Power Company  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201  
Telephone 205 877 7122

C. K. McCoy  
Vice President, Nuclear  
Vogtle Project

April 28, 1994



LCV-0136D

Docket Nos. 50-424  
50-425

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

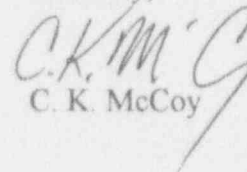
Ladies and Gentlemen:

**VOGTLE ELECTRIC GENERATING PLANT  
REPLY TO A NOTICE OF VIOLATION**

Pursuant to 10 CFR 2.201, Vogtle Electric Generating Plant (VEGP) submits the enclosed information in response to a violation identified in Inspection Reports 50-424,425/94-04 which concerns the inspection conducted on February 28, 1994 through March 4, 1994.

Should you have any questions, please contact this office.

Sincerely,

  
C. K. McCoy

CKM/AFS

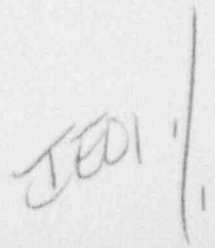
Enclosure

xc: Georgia Power Company  
Mr. J. B. Beasley  
Mr. M. Sheibani  
NORMS

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

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PDR



## **ENCLOSURE 1**

### **VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO A NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424;425/94-04**

The following is a transcription of the violation as cited in the Notice of Violation (NOV):

"10 CFR Part 50, Appendix B, Criterion XI requires in part, "a test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents." Further, it requires that, "Test procedures shall include provisions for assuring that all prerequisites for the given test have been met... Test results shall be documented and evaluated to assure that test requirements have been satisfied."

Contrary to the above, on March 4, 1994, Vogtle Test Procedure 26866-C, "Dynamic Testing of Motor Operated Valves Using Votes Analysis and Test System," Revision 1, dated February 19, 1993, did not incorporate the requirements and acceptance limits for determining operability of valves tested at less than design-basis conditions prior to returning the tested valves to service. Furthermore, the licensee chose not to evaluate test data for the motor operated valves tested in April 1993 until December 1993 although the valves were returned to service.

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

#### **RESPONSE TO VIOLATION (50-425/94-04-01)**

##### **Admission or Denial of the Violation:**

The violation occurred as stated in the notice of violation.

##### **Reason for the Violation:**

The violation was attributed to an inadequate test procedure that did not require detailed evaluation of MOV DP test data prior to returning the MOV to service. Georgia Power acknowledges that NRC letter dated December 23, 1992, "Acceptance of Schedule Extension for Completing Motor-Operated Valve Testing and Surveillance Program," requested that certain differential pressure parameters be addressed at design-basis conditions before returning each MOV to service. This request had not been fully incorporated into procedures for MOV dynamic testing. However, GPC does not believe that there is a clear regulatory requirement in GL 89-10 that these evaluations be performed as a part of MOV operability determination.

A primary objective of the DP test program is to validate the overall engineering methodology utilized in the GL 89-10 design review. The DP tests were not performed to demonstrate the operability of specific valves, but rather to obtain data to validate an analytical methodology

## ENCLOSURE 1 (CONTINUED)

### VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO A NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424;425/94-04

which can be applied to all valves in the GL 89-10 Program. A preliminary evaluation of the test data was performed on site prior to returning each valve to service. This evaluation confirmed that the thrust at control switch trip was within the specified window and that no mechanical or electrical anomalies existed that would affect the operability of the MOV. The test data was later analyzed by engineering with the objective of validating the analytical methodology utilized in the GL 89-10 design review and to confirm MOV behavior at design-basis pressure. This detailed engineering evaluation for 1R4 (Unit 1, 4th refueling outage) and 2R3 (Unit 2, 3rd refueling outage) test data, including the extrapolation of reduced DP tests to design-basis conditions, was completed on January 14, 1994, with the conclusion that the tested valves were capable of performing their design-basis functions.

#### Corrective Steps Which Have Been Taken and the Results Achieved:

The evaluation of the 1R4 and 2R3 DP test data, including extrapolation of reduced DP tests to design-basis conditions, was completed January 14, 1994. The evaluations concluded the valves were capable of performing their design-basis functions.

#### Corrective Steps Which Will Be Taken to Avoid Further Violations:

Procedure 26866-C will be revised prior to any additional valve D/P testing to incorporate additional acceptance criteria which must be satisfied prior to returning the MOV to service following dynamic testing. The intent will be to ensure valves tested at reduced DPs are capable of functioning at design-basis conditions. An abbreviated methodology for initial evaluation will be included in the procedure and will require extrapolation of the actual test data to design-basis conditions. Any problems identified during this initial review will be evaluated and resolved prior to returning the valve to service. If no problems are identified, the valve will be returned to service and a detailed engineering evaluation of DP test results will be performed. This review will be completed in a timely manner.

#### Date When Full Compliance Will Be Achieved:

Full compliance was achieved on January 14, 1994, when the engineering evaluation of the 1R4 and 2R3 test data, including the extrapolation of reduced DP tests to design-basis conditions, was completed and it was concluded that the tested valves were capable of performing their design-basis functions.