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July 9, 1990

the southern electric system

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

ELV-01881
0233

Docket Nos. 50-424
50-425

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

ATTN: James M. Taylor
Executive Director for Operations

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
COMMENTS ON NUREG-1410

Your letter of June 8, 1990 transmitted a copy of the NRC Incident Investigating Team (IIT) report (NUREG-1410) and stated that any comments should be provided by July 9, 1990. We believe that the IIT performed a thorough investigation of the event and that the report in general represents an accurate description of the circumstances surrounding the Site Area Emergency on March 20, 1990. We have reviewed the document and specific comments are attached.

Sincerely,

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

WGH,III/HWM/gm

Attachment

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

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

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ENCLOSURE

COMMENTS ON NUREG-1410

1. P. 1-5 states that the risk of core damage is greater from mid-loop operation than from a fuel handling accident; no basis to support this assumption is provided.
2. P. 2-3 states erroneously that "special containment building penetrations had been constructed in anticipation of the need to quickly close the containment building during an outage." They were in fact constructed to permit SG sludge lancing with the equipment hatch closed.
3. P. 3-11 (3.2.5) needs to recognize that an emergency start of the diesel generators at VEGP has been changed to include starting on loss of offsite power.
4. P. 5-22 (5.5.2.2) states that maintenance personnel should be trained in mid-loop operations. This has not been determined to be appropriate for required maintenance training through systematic analysis of job tasks.
5. P. 7-5 and Appendix K (p. k-8) (Also, on page 7-7 for the first refueling outage) list several "nonconservative conditions" that existed in the plant, with the implication that, in retrospect, these conditions should not have existed. GPC contends that sufficient risk analysis does not exist to show that the list is non-conservative.
6. P. 10-3 (Conclusion 10.4.1) and J-28 state that foreign material in the DG jacket water temperature switches is considered the most likely cause of the DG trips during the event. GPC concurs that internal contamination is the most likely cause of one switch tripping. The second switch, although it had internal foreign material, was also set low as a result of inadequate calibration procedures. Subsequent additional testing has shown that these switches are temperature sensitive, requiring that consistent calibration techniques be used to achieve the desired setting (reference LER 50-424/1990-006, revision 1). Therefore, GPC has concluded that the primary cause of the intermittent actuation of the jacket water temperature switches was inadequate calibration in conjunction with foreign material.
7. P. 10-8 (Conclusion 10.7.3) states that Vogtle had a high number of failures of DG sensors compared to the rest of the industry. From Appendix I (p. I-8) of the report which itemizes these failures, a large percentage of the problems were calibration setpoint out of specification during construction acceptance testing. Out of calibration in this application is not typically counted as a failure by either Vogtle or other plants in accordance with NPRDS reporting criteria; hence the NRC conclusion that Vogtle has a higher number of switch failures is not based on comparable data.
8. P. K-2, states erroneously that future SG eddy current testing will be conducted on only 20 percent of the tubes. VEGP currently plans to follow the EPRI guidelines which require a minimum of 20 percent of the tubes to be tested as a base scope, plus an augmented sample of additional tubes for any active damage mechanism.