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GE southern electric systems

W. G. Hairston, III
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ELV-01867
0473

Docket Nos. 50-424
50-425

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

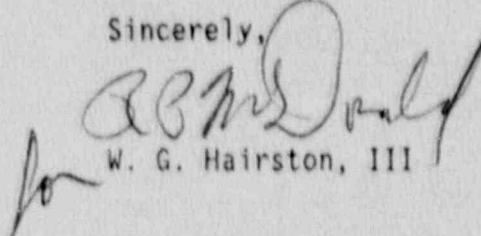
Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
REPLY TO A NOTICE OF VIOLATION

Pursuant to 10 CFR 2.201, Georgia Power Company (GPC) submits the enclosed information in response to a violation identified in Inspection Report 50-424/90-10 and 50-425/90-10 which concerns the inspection conducted by Mr. J. F. Rogge, Mr. R. F. Aiello and Mr. R. D. Starkey of the NRC from March 31 - May 18, 1990. 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/JLL/gm

Enclosure: Violations 50-424/90-10-01 and 50-425/90-10-01 and GPC Response

c(w): 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
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Mr. T. A. Reed, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

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ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2
NRC NOTICE OF VIOLATIONS 50-424/90-10-01 AND 50-425/90-10-01 AND GPC RESPONSE

"Technical Specification 6.7.1a requires that written procedures be established, implemented, and maintained covering activities delineated in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Revision 2, February 1978, delineates the types of safety-related activities that should be covered by written procedures and includes procedures for startup, operation, shutdown, and procedures for performing maintenance.

Engineering Procedure 54840-1-1-90-2, "Installation And Removal Instructions For The RCS Temporary Level Indication Tygon Tube And The Defeat Of The Residual Heat Removal Suction Valve Auto Closure Interlock," Revision 1, requires that the tygon tube routing does not have any kinks, bends, or other irregularities which could cause incorrect readings and that the tube has a continuous slope to the extent practical to prevent entrapment of air.

Contrary to the above, on April 8, 1990, the licensee failed to follow Engineering Procedure 54840-1-1-90-2 by allowing an air bubble to develop in the RCS tygon tube level indicator which caused indicated RCS level to read approximately 8 feet higher than actual RCS level.

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

RESPONSE TO VIOLATION 50-424/90-10-01

Admission or Denial of the Violation:

The violation occurred as stated.

Reason for the Violation:

As stated in the Notice of Violation, plant personnel failed to adequately implement Engineering Procedure 54840-1 which resulted in the faulty RCS level indication. Procedures for venting the tubing and installation of a new design change were contributing factors to this error.

ENCLOSURE 1 (CONTINUED)

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2
NRC NOTICE OF VIOLATIONS 50-424/90-10-01 AND 50-425/90-10-01 AND GPC RESPONSE

Corrective Steps Which Have Been Taken and the Results Achieved

The level indication error was corrected after the discrepancy was discovered.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

A permanent RCS level indication system is being installed on both units which reduces the use of tygon tubing to a vertical run during the next outages on both units. This will eliminate the possibility of any kinks, bends or other irregularities which could cause incorrect readings.

Since the present system will be used during the next outages on each unit while the new system is being installed, the affected procedures will be revised to strengthen and augment the instructions regarding the venting and routing of tygon tube to prevent the entrapment of air. Appropriate plant personnel will be given additional training in the revised procedures prior to the plant being placed in a condition that requires the use of tygon tube.

Date When Full Compliance Will Be Achieved:

The tygon tube was adjusted to clear the air bubble on April 8, 1990. Full compliance will be achieved when the affected procedures are revised and the permanent systems are installed on both units. The procedures will be revised and the appropriate training will be accomplished prior to the refueling outages.