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C. K. McCoy  
Vice President, Nuclear  
Vogtle Project



July 31, 1994

Mr. James Lieberman  
Director, Office of Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: NRC Demand for Information regarding George Bockhold, Jr.;  
Docket Nos. 50-425/50-425;  
License Nos. NPF-68/NPF-81; EA 94-037

Dear Mr. Lieberman:

This letter is written in response to the Demand for Information signed by Mr. James L. Milhoan on May 9, 1994 regarding George Bockhold, Jr. The Demand for Information requests further information to determine reasonable assurance that the Georgia Power Company ("GPC"), with the involvement of Mr. Bockhold, will provide complete and accurate information to the NRC and otherwise conduct activities in accordance with Commission requirements and why the Commission should not issue an order removing, or restricting the participation of Mr. Bockhold in NRC licensed activities.<sup>1/</sup>

During the relevant time period Mr. Bockhold was general manager of the Vogtle Electric Generating Plant. In that capacity he was responsible for the operation of plant Vogtle. In the wake of the March 20, 1990 Site Area Emergency (SAE), the NRC sent two successive inspection teams to the Vogtle site to investigate the event. Company personnel, as well as the NRC began to focus on the numerous issues that had to be addressed in investigating the event, including: truck and vehicular access to the switch yard; off-site emergency notification; personnel accountability during emergency events; communication difficulties between the plant site and corporate offices; loss of core cooling capabilities during the loss of off-site power due to reduced water inventories as a result of plant outage activities, and diesel generator performance during the events.

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<sup>1/</sup> References to exhibits contained throughout this response to the Demand for Information shall follow the exhibit numbering system used in the December 17, 1993, Office of Investigation's Report No. 2-90-020R, unless otherwise indicated.

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Immediately after the SAE, GPC's first priority was to place the plant into a safe condition. Management, as is appropriate and typical in such events, sought to get the plant back on track, into a "normal" configuration so that atypical activities and conditions are minimized. This forward-looking approach is important from a safety perspective; leaving the plant in an off-normal configuration for an extended period of time is neither desirable nor safe. Once the safety of the plant is assured, established, prudent operational practice is to plan the "recovery" of the plant in accordance with an approved schedule of activities. In addition to these activities, the general manager as well as the staff at the Vogtle site, interfaced with and responded to the two NRC investigation teams. Mr. Bockhold was responsible for returning the plant to a normal state as well as addressing all of the issues associated with the SAE. As the responsible individual, Mr. Bockhold relied upon his staff to complete the many activities associated with recovery of the plant, responding to the questions of the event review teams, determine the cause of the event, as well as assemble information for presentation to the NRC on April 9, 1990.

The numerous Incident Inspection Team ("IIT") transcripts which recorded contemporaneous conversations between Mr. Bockhold and members of the NRC inspection teams are replete with examples of how Mr. Bockhold handled these activities. The transcripts show the existence and use of multiple lines of communication between GPC and NRC personnel for the dissemination and development of information. Unquestionably there were voluminous amounts of complete and accurate information delivered to NRC personnel which facilitated the NRC's involvement in investigating the SAE and the special testing conducted on the DG's.

A few examples which illustrate this interaction, as well as the dissemination of information between Mr. Bockhold, GPC personnel and NRC personnel are as follows:<sup>2/</sup>

On March 26, 1990, the fully formed IIT was briefed by the Plant Vogtle staff. Specific plant personnel were assigned to interface with and provide information to IIT members. With respect to DG issues, Mr. Bockhold assigned Allen Mosbaugh and Mike Horton to the diesel/electrical issues. Paul Kochery was designated GPC's "point of contact" with respect to the DGs. (IIT #16-1, p. 1-13).

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<sup>2/</sup> Exhibit 113 which was delivered to the NRC October 7, 1993 contains numerous examples which illustrate this point.

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On March 28, 1990, Mr. Bockhold, with the help of Paul Kochery, informed the IIT that three lube oil pressure sensors had been changed out on the 1B DG which lead GPC to look at lube oil pressure and jacket water pressure sensors on the 1A DG. (This discussion initiated by GPC focused on the commonality issue between the DGs and Start 134). (IIT #145, p. 71).

On April 2, 1990, Mr. Bockhold discussed with the IIT his opinion that the plant had problems with the Calcon sensors during initial start-up phases of the diesels and during overhaul times, but not in between overhaul periods. (April 12, 1990-IIT #168-2, p. 14, 18; April 4, 1990-IIT #168-1, p. 60; April 3, 1990-IIT #257, p. 50).

Mr. Bockhold discussed aspects of diesel testing and instructed GPC individuals to notify Rick Kendall immediately if anything unexpected occurs with the DGs. (Exhibit 113, p. 240-241.)

It is within the above framework of information and activity that Mr. Bockhold prepared for the April 9 presentation and the many tasks and demands on his time should be considered. When his actions are viewed in context of all the activity surrounding the SAE and the days thereafter, it becomes abundantly evident that his actions and statements were justified and reasonable at the time.

In accordance with the requested Demand for Information, the following information, in writing and under oath, is provided:

A. A description of Mr. Bockhold's current position and responsibilities.

Mr. Bockhold is currently employed by Southern Nuclear Operating Company, Inc. ("Southern Nuclear") as General Manager, Nuclear Technical Services. His responsibilities include corporate support for work control reengineering associated with Plants Farley, Hatch and Vogtle, advanced reactor activities and other special projects.

B. An explanation of why, notwithstanding his knowledge of the NRC's interest in DG reliability and the importance of information on this issue to an NRC decision on

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restart, Mr. Bockhold failed to take sufficient steps to ensure that information presented to the NRC in the April 9, 1990 presentation and letter regarding DG reliability was accurate and complete.

By April 7, 1990, Mr. Bockhold knew GPC had been requested to make a presentation to the NRC on Monday, April 9, 1990 in support of GPC's request to restart Unit 1 and that he needed to address issues raised by the NRC as well as lessons learned by GPC from the SAE event. DGs were one of many important issues raised by the NRC. Others were just as important: access control; mid-loop configuration and outage planning; ENN functions; emergency director actions; and accountability of personnel. While Mr. Bockhold was aware of the general aspects of the issues he was not, and could not be, expected to be knowledgeable of the details of all the issues. As a result, as any high level manager would do, he relied upon his staff to provide him with the necessary information he needed to prepare for the presentation.

Mr. Bockhold anticipated questions on operability of the DGs and discussions of the calcon sensors since the root cause of the SAE was still not conclusively known. It was intended that with respect to the DGs, the presentation would present a review of the comprehensive testing of the DGs and demonstrate that "... [w]e used the best industry practices to declare this diesel operative. . . ." (Exhibit 12, page 7).

On the weekend prior to April 9, 1990 Mr. Bockhold directed the preparation of transparencies to be used during the presentation including a transparency entitled "Diesel Testing." (Exhibit 7). The sequence of activity in relation to the special testing of the DGs was generally known to Mr. Bockhold but it was necessary to rely on individuals from engineering (Ken Burr) and operations (Jimmy Paul Cash) in order to obtain specific detailed information. The details regarding the DG testing and start count was not data which Mr. Bockhold, with the overall responsibility for the plant (including the event recovery, day to day oversight and IIT interface) would be reasonably expected to possess. As a result, Mr. Bockhold requested Jimmy Paul Cash to compile the number of successful starts of the DGs for inclusion on the transparency. (Exhibit 9, page 7).

When Mr. Bockhold assigned the task to Mr. Cash he knew Mr. Cash was a member of the Event Critique Team as well as a degreed SRO licensed unit superintendent and would be capable of obtaining the information requested. He also was aware that the control room logs would be used to obtain this kind of data and that selecting someone from operations

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seemed logical. A review of the transcripts and evidence available in this matter establish that Mr. Cash understood the assignment and did not need much supervision in the narrow task assigned him. Mr. Cash understood that he was to review the logbooks and determine how many starts had occurred without significant problems. (Exhibit 9, page 3). He understood that Mr. Bockhold wanted the kind of starts without "significant problems, i.e., with the diesel starting properly and reached the required voltage and frequency." He interpreted "significant problems" to be anything which would have prevented the diesel from operating in an emergency. Mr. Bockhold had the same understanding. However, this did not mean that Mr. Bockhold did not want to be informed of the existence of any problems or failures. (GPC response to NRC First Set of Interrogatories, Response 7a and b, August 9, 1993).

After Mr. Cash obtained this information and presented it, Mr. Bockhold did not know of any starts that had significant problems. (Exhibit 9, pp. 15-16). Mr. Cash recalled explaining to Mr. Bockhold that the logs which were available to him to obtain the necessary information were not the engineering logs from "... the engineer who kept up with the start count . . . ." (Exhibit 10, p. 43). Mr. Cash was also aware that the information he obtained was to be used for the presentation to the NRC. (Exhibit 10, pp. 17-18). He realized that the transparency was intended "to describe the test program we went through, the trouble shooting process that we went through in addressing the problems that we had seen on March 20." (Exhibit 10, p. 46, 67-68). Cash was not confused with his assignment. (Exhibit 10, page 88). He was able to identify some of the verbiage on the transparency but not all. (Exhibit 10, page 39). He knew his numbers would be used on the transparency. (Exhibit 10, p. 26). The numbers on the transparency below the line were given to Mr. Bockhold by Mr. Cash. (Exhibit 13, p. 9 and 10). He prepared a handwritten list of DG starts. (Exhibit 10, p. 26, 27).

After the presentation Mr. Cash spoke to Mr. Bockhold and told him that the starts referred to during the presentation were not valid test starts. Mr. Bockhold replied that everybody understood this fact. (Exhibit 10, p. 51). This conversation is consistent with the direction given to Mr. Cash and indicates that Mr. Cash understood the assignment. There was no indication to Mr. Bockhold that "problems" were contained within the "successful starts" or that the count started prior to sensor calibration.

GPC is of the opinion that the exhibits to Mr. Cash's June 24, 1993 OI interview are the typed version of the hand written lists of DG starts which he developed in support of the transparency used for the April 9, 1990 presentation. (GPC response to NRC First



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Interrogatories dated June 16, 1993, question 9 and 10). GPC also believes that Mr. Cash received a copy of a draft of the DG special testing transparency while he assembled the requested information. He assisted with the formatting of the transparency and supplied the start count numbers (Exhibit 10, p. 26) and the secretary who Mr. Cash assisted in formatting the transparency recalled Mr. Cash's modifications of the actual start numbers on the transparency. Based on this information, GPC has concluded that the information presented to Mr. Bockhold by Mr. Cash was both oral and written.

Mr. Bockhold intended the presentation to focus on the special testing and the sensors of the DGs. The number of successful starts without problems or failures was a small piece of information to be conveyed to the NRC. The import of the presentation was to demonstrate that the Vogtle Unit 1 DGs were reliable. Mr. Bockhold in preparing for the presentation relied on his own knowledge and experience as to the events since the SAE and also on the information gathered by his subordinates. He was not aware of any problems or failures associated with the 1B DG which would call into question the reliability of the DG. There is no evidence to indicate that Mr. Cash at any time indicated to Mr. Bockhold that he did not follow nor understand the instructions for his assignment and there was no reason for Mr. Bockhold to question Mr. Cash on the information he presented. Accordingly, after considering these events and the actions of Mr. Bockhold, GPC believes that Mr. Bockhold took sufficient steps to ensure that the information presented to the NRC, orally at the presentation, and in the April 9 letter was complete and accurate. No fair basis exists for the conclusion that Mr. Bockhold either knew or should have known of the error in judgment of Mr. Cash in including starts with problems in his count.

C. An explanation of why, notwithstanding his lack of a sound basis for agreeing that the term CTP was adequate to convey what he intended (i.e., that the DG start count being used as the basis for the April 19, 1990 LER began after testing of the control systems that did not require diesel starts), Mr. Bockhold allowed this language to be included in the April 19, 1990 LER.

A review of the numerous transcripts and available evidence relevant to this issue establishes that Mr. Bockhold always believed that the use of the term "comprehensive test program of the control system" referred to a point after recalibration of the calcon sensors. There is no evidence to indicate that Mr. Bockhold ever changed his understanding of this phrase and even the transparency used at the April 9 presentation has "sensor calibration"

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appearing prior to the starts. During the period of April 9, 1990 and April 19, 1990 Mr. Bockhold was not presented with any information that would alert him to any differences in interpretation of this phrase.

Mr. Bockhold was aware as of April 19, 1990 that there had been additional starts of the DGs between the period of April 9, through April 19, 1990 although the specific number was not known. (Exhibit 36, p. 8). Mr. Bockhold had also been informed that Technical Support personnel were in the process of reviewing the control room logs to verify the start count number. (Id.) John G. Aufdenkampe, the VEGP Manager - Technical Support, informed Mr. Bockhold that his people came up with greater than 20 starts by using the numbers from the April 9 letter and adding the number of starts that occurred between April 9 and April 19, 1990. This information confirmed in Mr. Bockhold's mind that there were at least 18 starts after the comprehensive test program of the control systems of both engines.

The April 19, 1990 conversation between John Aufdenkampe, William S. Shipman, the General Manager - Nuclear Support and Allen L. Mosbaugh, the acting VEGP Assistant General Manager - Plant Support clearly indicate that Mr. Bockhold had previously discussed his understanding of the phrase "comprehensive test program of the control systems of both engines" with Mr. Aufdenkampe and Mr. Shipman. They relayed to Mr. Mosbaugh their conversation with Mr. Bockhold and his belief that the starts occurred after the calibration of all the sensors. The conversation included an explanation of the logic behind Mr. Bockhold's rationale (Exhibit 36, p. 20), i.e., after all the bugs were worked out there were a number of DG starts and the DGs work fine. (Exhibit 36, p. 25). The recorded conversations in Exhibit 36 indicate that Mr. Bockhold was not given any information which would have brought to his attention that others had a different understanding of the terminology that he used or that the information he based his statements on was erroneous.

The April 19 tape recordings reflected Mr. Bockhold's reliance on his managers and support staff to obtain accurate information. It is reasonable for Mr. Bockhold to believe that his managers or support staff would have notified him had they determined that he relied upon inaccurate information or that any terminology used by him was subject to multiple connotations. In reference to the phrase "CTP", Mr. Bockhold always believed that the comprehensive test program meant after the 1B recalibration of the sensors and logic testing. For the 1B DG these activities correspond to dates of March 26 and March 27 with his understanding being consistent with that of the transparency.

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The managers at both the plant and corporate were aware of the connotation attributed to the phrase comprehensive test program of the control systems by Mr. Bockhold and even though they discussed the possibility of various connotations being attributable to the phrase, there is no evidence to indicate that Mr. Bockhold was made aware of these discussions. He continued to believe that Mr. Cash's numbers were correct and that those numbers represented the starts after recalibration of the sensors. While Exhibit 36 established that a review of the logs was being conducted to verify the start counts, there is no indication that Mr. Bockhold was informed of the results of the review or that there was a discrepancy with the start count information he relied upon as the basis for his statements.

Mr. Bockhold, as general manager of the plant continued to focus on the operation of the plant. Mr. Bockhold relied on his subordinates to determine the accuracy of the LER; reliance which was reasonable and justified. The managers' conversations reflected that possibly the phrase regarding the test program was subject to various connotations and also began to question the accuracy of the start count. Mr. Bockhold was not informed of the difficulty the managers were having in resolving these issues. Since Mr. Bockhold was not aware of any information to the contrary, it is reasonable for him to assume that the phrase he has referred to is both accurate and understood to have the same meaning by everyone. There is no evidence to conclude that Mr. Bockhold lacked a sound basis for agreeing to use the term "CTP" nor is there any evidence to conclude that he should have recognized the inadequacy of the term based on ambiguity or vagueness.

D. An explanation of why, notwithstanding his knowledge that questions had been raised regarding the accuracy of the DG start information and his knowledge of the informal means by which the data he was relying on was developed, Mr. Bockhold failed to take sufficient steps to ensure that information included in the April 19, 1990 LER was complete and accurate.

The Demand for Information faults Mr. Bockhold for failing to take sufficient steps to ensure that the information included in the LER was complete and accurate and is based on the assumption that he was aware that questions had been raised regarding the accuracy of the DG start information and that he was aware of the "informal means" by which the data that he was relying on was developed. . . . As indicated in the analysis of Violation C, Mr. Bockhold was not presented with any evidence which would call into question the information upon which he relied. There is also no evidence to indicate that the diesel start



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information had been gathered by informal means or that Mr. Bockhold was aware that information had been gathered in an informal means. To the contrary, the evidence establishes an extensive and detailed effort by Mr. Cash to obtain the information that was requested of him. Mr. Cash reviewed the log book page by page. (Exhibit 36, p.35). He assisted with the formatting of the transparency and supplied the start count numbers. (Exhibit 10, p. 26). He developed a handwritten list of starts which he used in support of the transparency used on April 9, 1990. (Exhibit 9, p.5; Exhibit 10, p. 21). GPC believes Mr. Cash had been provided a draft of the transparency around the time he reviewed the logs. He was aware the transparency and his data would be used for the presentation to the NRC and was related to the confirmation of action letter. (Exhibit 9, p. 5). Mr. Cash understood that Mr. Bockhold wanted a count of starts without "significant problems, where the diesel had started properly and reached the required voltage and frequency." Mr. Cash interpreted "significant problems" to be anything which would have prevented the diesel from operating in an emergency. (GPC response to NRC Staff's First Set of Interrogatories, Response 7a and b, August 9, 1993.)

The number of successful diesel starts was not known to Mr. Bockhold when he requested Mr. Cash to obtain the information. He was aware of the general testing activities, and was briefed on the status contemporaneous with those events. He knew there had been a lot of starts, but not how many. As a result, he assigned Mr. Cash a very narrow, defined task: compile the number of successful starts of the diesels for inclusion on a draft transparency. Mr. Bockhold, at the time, was aware of the following about Mr. Cash: Mr. Cash was a SRO licensed unit superintendent; had been a member of the event review team; had previously assembled information for the IIT (Tape 19, p. 23); and was on the full management team at the plant on the weekend of April 7 and 8, 1990.

The information developed by Mr. Cash was developed from the best available documents and it was reasonable for Mr. Bockhold to rely on Mr. Cash and the work he produced. This is especially true since there is no evidence to indicate that Mr. Cash ever voiced a concern or any questions regarding either his task or the information he obtained. In fact the transcripts of Mr. Cash's interviews clearly establish that he knew why he was gathering the information, the use of the information and the message to be conveyed. At the conclusion of the presentation on April 9, 1990, Mr. Cash commented to Mr. Bockhold that the starts were not valid successful starts. This conversation confirmed Mr. Cash's understanding of the narrow task assigned to him.

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The above information was known to Mr. Bockhold during the conversations on April 19, 1990 regarding the wording of the LER. In considering the start count number to be used in the LER, Mr. Bockhold was aware of additional starts of the DGs during the period between April 9 and April 19. He had been informed there was an ongoing review of the logs. It was justified and reasonable for Mr. Bockhold, as general manager, to assume that if an error or discrepancy had in fact been found, he would have been notified. The evidence indicates that Mr. Bockhold was not informed of any conflict or ambiguity regarding the data which he based his statements.

In hindsight, and notwithstanding all this evidence, GPC contends that on April 19, Mr. Bockhold likely should have followed up on the tasking of Mr. Mosbaugh and Mr. Aufdenkampe to complete their verification of DG start counts. The mere fact that members of his staff had to ask Mr. Bockhold about the DG start count information indicates that maybe they were not carrying out their duties to verify the count information. On May 8, 1990, Mr. Bockhold articulated his recognition of his own weakness and discussed his own natural communications style including shortcomings associated with his management style. Specifically, Mr. Bockhold realized that while he believes he considers all aspects of a problem, he does make decisions quickly and is sometimes too forceful in his communications. Mr. Bockhold realized that he must allow time for all aspects of a problem to be aired and to make sure that those who work for him feel that they have an opportunity to fully express their opinions. His forceful communications style may have contributed to his staff not performing an appropriate DG verification count on April 19, 1990. This is a lesson learned by Mr. Bockhold as is evidenced by his work over the past several years in which he has learned not to make decisions so quickly and realizes that all aspects of an issue must be considered prior to making a final decision.

E. An explanation of why, notwithstanding his review of the June 29, 1990 letter, which stated that it would clarify the April 9, 1990 letter, Mr. Bockhold failed to ensure that the June 29, 1990 cover letter clarified the April 9, 1990 letter.

GPC contends that the June 29 cover letter did clarify the April 9 letter and its position is set forth in the response to the NOV. In addition, the following information is supplied. On April 30, 1990, Mr. Mosbaugh gave Mr. Bockhold a listing of 1B DG starts, which, when confirmed on May 2, 1990, showed that the start count reported in the April 9 presentation, the April 9 CAL response, and the April 19 LER were incorrect. When

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Bockhold was initially presented with the conflicting data, he requested Mr. Mosbaugh to obtain the correct information and prepare the appropriate documentation to be sent to the NRC and correct the previously filed documents. On May 24, 1990, Mr. Bockhold signed the action item off as complete and attached a note instructing Mr. Aufdenkampe to use the LER cover letter to correct the other incorrect document. (Exhibit 5, p.195.)

After being informed that the April 19 DG start counts was in error, W.G. Hairston, III, the Senior Vice President-Nuclear Operations informed the Regional Administrator that a revision to the April 19 LER would be submitted, in part, to correct the DG start count. After being provided conflicting data for the second time, Mr. Hairston again notified the Regional Administrator and requested that an audit be conducted by GPC's Safety Audit and Engineering Review (SAER) group to verify the correct start count numbers for the LER revision.

The finalization of the LER by the Plant Review Board awaited the SAER and its results. Mr. Bockhold believed that although he was still responsible for any information that was sent to the NRC, the revision, as it applied to the start count, would be based on the SAER audit. Mr. Bockhold recalls informing Georgie R. Frederick, the Supervisor - SAER that Mr. Cash went to the control room logs for his information for the April 9 data which was included in the LER.

When Mr. Bockhold reviewed the cover letter, he did so for major mistakes. He did not know what type of personnel error was in Mr. Cash's performance of the start count and viewed the SAER audit as logical, reasonable and consistent with his personal knowledge. He believed that the cover letter and the revised LER clarified and provided additional information concerning significant safety items associated with diesel operability/reliability (a purpose of the April 9, 1990 letter) and identified additional start failures associated with the 1B DG including referencing the Technical Specification Special Report 1-90-4. Mr. Bockhold believed that the cover letter corrected the information previously included in the LER which was the same information included in the April 9, 1990 letter and that a correction of the LER acted as a correction of the April 9 letter.

F. An explanation of why, notwithstanding his knowledge that the Unit Superintendent was not confused about the distinction between successful starts and valid tests when the Unit Superintendent collected start data for the April 9, 1990

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presentation and letter, Mr. Bockhold allowed the information to be included in the August 30, 1990 letter as one of the reasons for the error in the April 9, 1990 letter.

GPC does not believe that the August 30, 1990 letter to the NRC was incomplete or inaccurate in a material respect, as reflected in GPC's response to the May 9, 1994 Notice of Violation (EA93-304) related to this matter. GPC's response explained the August 30, 1990 letter fulfilled the communication purpose for which it was intended. The language of the August 30 letter is misquoted in the Notice of Violation and cannot reasonably be construed as identifying one of the causes of the error in the April 9 letter as Unit Superintendent confusion.

The August 30 letter did not state what the error of the April 9 letter was, but rather what the "confusion" was about the April 9 letter and the LER. Mr. Bockhold in the Plant Review Board purposefully changed the wording in the letter from "errors" to "confusion" because the import of the letter was to explain the historic context of the letter. The tape transcript of the August 29, 1990 Plant Review Board Meeting as well as a literal reading of the letter substantiate the fact that the letter was accurate to the then current knowledge.

Mr. Bockhold did not believe that the Unit Superintendent was confused when he performed his count, but rather the confusion arose after NRC and GPC personnel debated the terminology used to describe the starts. This belief is clearly substantiated by the edited letter where it is stated "our use of the term..." which referenced GPC's connotation and by the modification proposed by Mr. Bockhold to change "errors" to "confusion". (Exhibit 9, pp. 8-9; Exhibit 12, p. 11-12; and Exhibit 60, insert p. 15 and 20).

G. An explanation of the corrective actions taken, or planned by the Licensee to address Mr. Bockhold's performance failures.

The Senior Vice-President of GPC and Mr. Bockhold's immediate supervisor within Southern Nuclear have met with Mr. Bockhold and reviewed his actions and responsibilities which are the subject of this NOV. This review focused on the mistakes made by Mr. Bockhold's organization and his personal performance failures to assure that in the future all

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his responsibilities including delegated responsibilities are carried out without violation of NRC regulations. This review also included ways to improve his management capabilities.

In addition, in response to prior expressed concerns by the NRC regarding VEGP personnel, Mr. Bockhold accepted responsibility for implementing corrective action to address the bases of the NRC's perception. On May 8, 1990 Mr. Bockhold and Mr. McCoy met with the managers of the plant and openly discussed the NRC's concerns, and Mr. Bockhold recognized and discussed his own natural communications style including shortcomings associated with his management style. Specifically, Mr. Bockhold realized that while he believes he considers all aspects of a problem, he does make decisions quickly and is sometimes too forceful in his communication style. Mr. Bockhold realized that he must allow time for all aspects of a problem to be aired and make sure that people that he interfaces with feel that they have an opportunity to fully express their opinions. This is a lesson learned by Mr. Bockhold as is evidenced by his work over the past several years where he has learned not to make decisions so quickly and realizes that all aspects of an issue must be considered prior to making a final decision. Finally, Mr. Bockhold continues to make his personnel commitment, to the very best of his ability, to conduct licensed activities in accordance with all NRC requirements.

H. Given the four violations of NRC requirements, an explanation as to why NRC should have confidence that the Licensee, with the involvement of Mr. Bockhold, will in the future conduct licensed activities in accordance with all NRC requirements, including the requirements of 10 CFR 50.9, "Completeness and accuracy of information."

As explained in the preceding and GPC's response to the NOV in 93-304, Mr. Bockhold has not acted with careless disregard or indifference to regulatory requirements or otherwise conducted his activities in a manner to call into question his fitness to engage in licensed activities. Mr. Bockhold has committed to work very carefully to provide complete and accurate information to the NRC and therefore the NRC should have confidence in his involvement in future licensed activities.

Mr. Bockhold has been out of the plant line management for the past three and one half years. The Progress reports received on Mr. Bockhold's performance over this period of time have shown an improvement in dealing with people as well as problems. He has been recognized as a highly skilled, technical, competent, and experienced manager. It was

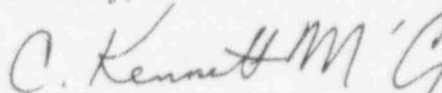


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also noted that he has dealt with his prior shortcomings with consensus building and seeking advice from others.

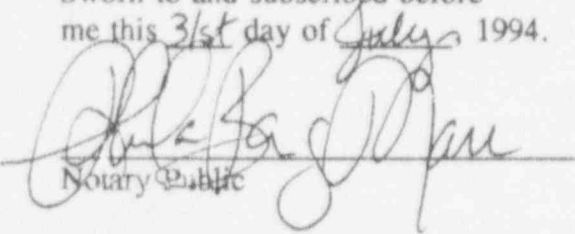
Please feel free to contact me should you desire additional information regarding this matter. This response to the Demand for Information has been developed after substantial inquiry under the supervision of me and other GPC officers. The response was reviewed by certain individuals familiar with these events for accuracy and completeness. While I do not have personal knowledge of all the facts as stated, I and others have thoroughly reviewed and evaluated the information. Based on all these efforts, I have high confidence of the response's accuracy. The information provided in this response is true and correct to the best of my knowledge and belief. I am available to provide an clarification, expansion or verification which you should require. Mr. C. Ken McCoy states that he is the Vice President-Vogtle Project and is authorized to execute this letter on behalf of Georgia Power Company.

Sincerely,



C. Kenneth McCoy

Sworn to and subscribed before  
me this 31st day of July, 1994.

  
Notary Public

My Commission Expires:

Notary Public, Fulton County, Georgia.  
My Commission Expires January 29, 1996

[NOTARIAL SEAL]

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xc: Georgia Power Company

Mr. J. Beasley, Jr.

Mr. M. Sheibani

NORMS

U.S. Nuclear Regulatory Commission

Mr. S. D. Ebnetter, Regional Administrator

Mr. D.S. Hood, Licensing Project Manager, NRR

Mr. B.R. Bonser, Senior Resident Inspector, Vogtle

Assistant General Counsel for Hearings and Enforcement