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RELATED CORRESPONDENCE

DOCKETED
USNRC
August 10, 1994

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'94 AUG 11 P5:15

OFFICE OF SECRETARY
DOCKETING & SERVICE
Before the Atomic Safety and Licensing Board

| | | |
|-----------------------------|---|---------------------------|
| In the Matter of |) | Docket Nos. 50-424-OLA-3 |
| |) | 50-425-OLA-3 |
| GEORGIA POWER COMPANY, |) | |
| et al. |) | Re: License Amendment |
| |) | (Transfer to Southern |
| (Vogtle Electric Generating |) | Nuclear) |
| Plant, Units 1 and 2) |) | |
| |) | ASLBP No. 93-671-01-OLA-3 |

GEORGIA POWER COMPANY'S ADDITIONAL RESPONSE TO
INTERVENOR'S SECOND REQUEST FOR ADMISSIONS

I. INTRODUCTION.

Georgia Power Company ("GPC") hereby completes its responses to Intervenor's Second Request for Admissions to Georgia Power Company, dated July 1, 1994 ("Second Request for Admissions"). The parties agreed, with the Board's approval, that GPC's response to the Second Request for Admissions would be done in two steps. First, by July 29, 1994, GPC was to respond to each of the statements of evidence cited in the Vogtle Coordinating Group ("VCG") report, dated February 9, 1994; that response was filed on July 29, 1994. Second, by August 9, 1994,^{1/} GPC would respond to the conclusions in both the VCG and OI reports; this response fulfills that commitment.

^{1/}On August 9, 1994, counsel for GPC was granted a one-day extension by Judge Bloch after unsuccessfully attempting to speak with Intervenor's counsel about the extension. Counsel for the NRC Staff was contacted and did not object to this extension.

II. GENERAL OBJECTIONS.

GPC incorporates herein each of the General Objections stated in Georgia Power Company's Response to Intervenor's Second Request for Admissions, dated July 29, 1994. In addition, GPC objects to these requests for admissions to the extent they seek to establish a standard for character (i.e., failure to use reasonable care) in conflict with prior precedent interpreting Section 182a of the Atomic Energy Act. Moreover, GPC states that it does not know what interpretation the NRC assigns to the term "failure to exercise reasonable care." Further, as a general matter, GPC objects to the conclusions in the OI Report on the grounds that (a) the "evidence" developed by OI does not support OI's conclusions, and (b) OI's "investigation" did not satisfy the NRC's practices and policies. Without waiving these objections, GPC has endeavored to respond to each of the requests for admission.

III. GPC RESPONSES.

A. Response to Request to Admit Allegations 1 and 2 Conclusions.

1. Coordinating Group Conclusion for Allegation Nos. 1 and 2:

The Group evaluated the events that occurred on April 9, 1990, and concluded that the April 9 presentation and letter contained the same inaccurate information. Accordingly, the Group analyzed the failure to provide accurate DG start information in the April 9 presentation and letter together. The root causes of this failure were (1) the Vogtle Electric Generating Plant (VEGP) General Manager (BOCKHOLD) did not exercise reasonable care in directing the Unit Superintendent (CASH) to collect DG start information and in assessing what CASH gave him and (2) CASH did not exercise reasonable care in performing and

reporting his count. These failures did not involve wrongdoing. The inaccuracy was material in that the NRC relied, in part, upon the information provided by GPC in an April 9 oral presentation and letter in reaching the NRC decision to allow Unit 1 to return to power operation.

GPC Response:

GPC admits that the April 9 presentation and letter of the same date contain the same inaccurate information (see GPC's Reply to Notice of Violation, dated July 31, 1994, NRC Docket No. 50-424, License No. NPF-68 [Enforcement Action 93-304] (hereinafter "GPC Reply to Notice of Violation"), Violation A. GPC denies that the "root causes" for the failure to provide accurate information was the failure to exercise reasonable care of the VEGP General Manager. GPC admits that the Unit Superintendent acted unreasonably in reporting his count, but denies that he was unreasonable in performing his count. GPC admits that the actions of both the General Manager and the Unit Superintendent did not involve wrongdoing. With respect to the materiality of the inaccuracy, GPC lacks sufficient information to admit or deny that the NRC relied on the inaccurate information and GPC has requested the NRC to reconsider whether the inaccurate statements, in context and in light of the actual knowledge of NRC experts at the time, was material. See GPC's Reply to Notice of Violation, Violation A; see also Georgia Power Company's Response to Intervenor's Second Request for Admissions, July 29, 1994 Responses to Allegation Nos. 1 and 2, Evidentiary Statements Nos. 9, 12, 13, 16, 20, 42, 64, 65 and 66.

2. OI Conclusion for Allegation No. 1:

Based on the evidence developed during this investigation, it is concluded that on April 9, 1990, BOCKHOLD deliberately presented incomplete and inaccurate information to NRC regarding the testing of the VEGP Unit 1 EDGs conducted subsequent to a March 20, 1990, Site Area Emergency (SAE) at VEGP. This occurred at the NRC, RII offices in Atlanta, GA, during a GPC oral presentation in support of their request to return VEGP, Unit 1 to power operations.

GPC Response:

GPC denies the OI conclusion based on the VEGP General Manager's testimony, the actions of the VEGP General Manager, and the Vogtle Coordinating Group's analysis of the VEGP General Manager's intent.

. . . Bockhold did not intend to present a complete accounting of all DG starts following the March 20 event. He wanted to show that the DGs had been tested and started a large number of times following DG overhaul activities. There were no unsuccessful starts or problems or failures after overhaul activities. Bockhold's intent to present successful starts after overhaul activities was not inconsistent with the NRC's request for the licensee to address the reliability and performance of the DGs. . . . (Vogtle Coordinating Group Analysis, p. 13.)

3. OI Conclusion for Allegation No. 2:

Based on the evidence developed during the investigation, it is concluded that, on April 9, 1990, in a letter to NRC captioned VOGTLE ELECTRIC GENERATING PLANT CONFIRMATION OF ACTION LETTER, HAIRSTON signed a letter which presented a misleading, incomplete, and inaccurate statement of diesel test results. This statement was based upon the deliberately incomplete, inaccurate diesel test information presented in the aforementioned oral presentation by BOCKHOLD to the NRC. BOCKHOLD

reviewed and approved this letter for HAIRSTON's signature.

GPC Response:

GPC denies the OI conclusion, with a clarification that on April 9, 1990 the referenced letter was signed by Hairston and contained an inaccurate statement of the number of consecutive successful starts without problems or failures which had occurred on the 1B diesel generator ("DG") at the Vogtle facility as of April 9, 1990. See Vogtle Coordinating Group Analysis, at 13; see also GPC's denial of OI conclusion for Allegation 1, supra. GPC admits that Bockhold reviewed and approved this letter for Hairston's signature (or a draft of this letter with the same wording associated with DG testing).

B. Response to Request to Admit Allegation 3 Conclusions.

1. Coordinating Group Conclusion for Allegation No. 3:

GPC submitted an inaccurate statement of DG test data in Licensee Event Report (LER) 90-006 dated April 19, 1990. Specifically, the licensee failed to provide accurate information with respect to the number of consecutive successful DG starts subsequent to the completion of a "comprehensive test program" (CTP).

The root causes for this failure were as follows. First, BOCKHOLD failed to exercise reasonable care in agreeing to the use of the term CTP in the LER since this term failed to adequately identify when the reported count of consecutive successful DG starts began. Second, SHIPMAN and AUFDENKAMPE failed to exercise reasonable care in the preparation of the April 19 LER in that: (1) they did not fully understand the term CTP, and (2) in light of the different interpretation of the term CTP raised by MOSBAUGH, they were aware

that the term was either imprecise or ambiguous. Third, MOSBAUGH acted unreasonably in failing to resolve his concern about the definition of the term CTP. This failure contributed to the inaccuracy in the April 19 LER. The inaccuracy was material in that knowledge by the NRC of a lesser number of consecutive successful starts on 1B DG following completion of the CTP without problems or failures could have had a natural tendency or capability to cause the NRC to inquire further.

GPC Response:

GPC admits that the NRC reasonably could conclude that LER-90-006 was inaccurate (GPC Reply to Notice of Violation, Executive Summary, Violation C, p. 2), admits that no common definition of "comprehensive test program of the control systems" was understood at the time the LER was submitted to the NRC (GPC's Reply to Notice to Violation, Violation C, pp. 18-19), and admits that Shipman, Aufdenkampe and Mosbaugh failed to clarify the LER's ambiguous terminology (Id. at Violation C, p. 18). GPC admits that Bockhold agreed to the use of the term "CTP" in the LER (Id. at Violation C, p. 16) and that this term failed to establish a common definition of when the reported count of consecutive successful 1B DG starts actually began. GPC admits that Bockhold acted unreasonably when he allowed the CTP term and associated start count to be included in the LER knowing that the Technical Support staff had not completed its verification effort (Id. at Violation C, p. 16), with the clarification that, based on statements by Messrs. Shipman and Aufdenkampe on Tape 58, he apparently advised Messrs. Shipman and Aufdenkampe that the starting point of the starts count was after the completion of the sensor calibrations. GPC denies that Shipman

did not fully understand the term "CTP" but admits that Shipman knew there were different interpretations of the term. GPC admits that Aufdenkampe did not fully understand the term "CTP" and was aware that there were different interpretations of the term and that the term was either imprecise or ambiguous. However, GPC denies that Shipman or Aufdenkampe failed to exercise reasonable care in the preparation of the LER since they believed that the matter had been discussed between Mr. McCoy and the NRC's Mr. Brockman, and that they had correctly evaluated the data as it related to diesel generator reliability. GPC admits that Mosbaugh failed to resolve his concern about the definition of the term "CTP," and that this failure contributed to the inaccuracy in the LER. However, GPC lacks sufficient information to either admit or deny that Mosbaugh acted unreasonably. See November 4, 1993 OI Interview of Allen L. Mosbaugh, Tr. 91-96. GPC lacks sufficient information to admit or deny that the inaccuracy was material and has requested the NRC to reconsider whether the ambiguity in the LER was material. See generally GPC's Reply to Notice of Violation, Violation C; GPC's Response to Intervenor's Second Request for Admissions, July 29, 1994, Responses to Allegation No. 3, Evidentiary Statements 19, 22, 23, 24, 30, 31, 32, 33, and 39.

2. OI Conclusion for Allegation No. 3:

Based upon the evidence developed during the investigation, it is concluded that on April 19, 1990, HAIRSTON, with, at a minimum of careless disregard, submitted a false statement of diesel test results to the NRC in GPC LER 90-006, which pertained to the SAE.

This false statement was submitted as a direct result of deliberate actions, on April 19, 1990, by HAIRSTON, McCOY, SHIPMAN, BOCKHOLD. These senior managers reworded an existing statement of diesel testing in a draft LER, after SHIPMAN and STRINGFELLOW had been told by MOSBAUGH and AUFDENKAMPE that this draft LER statement, and its corresponding statement in the GPC letter to NRC of April 9, 1990, (upon which the draft LER statement was based) were false. However, McCOY's efforts to make the rewording similar to the statement in the April 9, 1990, letter, combined with SHIPMAN's knowledge that the new statement could not have been definitively verified prior to the issuance of the LER, resulted in the reworded statement being false.

GPC Response:

This conclusion is denied. See Vogtle Coordinating Group Analysis, at 20-21. Although the NRC could reasonably conclude that the LER was inaccurate, the LER was neither submitted by GPC nor signed by Hairston with careless disregard as to its accuracy. GPC admits the "existing statement of diesel testing" in the draft LER was reworded by senior managers after the draft statement was questioned as to accuracy, with the clarification that Hairston did not participate in this rewording effort. GPC denies that an effort by McCoy to make the reworded LER statement similar to the statement in the April 9, 1990 letter (he did so on the basis of assurances that the April 9 numbers were "verified correct" and were after the completion of the comprehensive test program of the control systems) proximately resulted in the specific language of the reworded statement being based on erroneous data. See Tape 58. GPC admits that (a) Shipman knew the new statement could not be definitively verified by the Technical Support staff prior to the

issuance of the LER, and (b) the fact the new statement could not be definitively verified was a contributing factor in the reworded statement being inaccurate. However, the reworded statement was submitted after Aufdenkampe indicated to Shipman that the reworded statement was supported by the data which he and Mosbaugh had received (which data Shipman did not possess); in that same conversation, Mosbaugh did not take exception to the reworded statement when directly asked by Aufdenkampe. Id.

C. Response to Request to Admit Allegation No. 4 Conclusions.

1. Coordinating Group Conclusion for Allegation No. 4:

The Group concluded that there were three examples where inaccurate or incomplete information was provided in the June 29, 1990, letter.

The first example involves GPC's failure to include information clarifying the April 9 letter. The root cause for this failure was that GPC staff and management acted with careless disregard when it failed to correct the omission after being notified by a GPC employee [sic] that the letter failed to include information to clarify the DG start counts reported in the April 9 letter. The incompleteness was material in that the NRC subsequently requested GPC to make a submittal clarifying the April 9 letter.

The second example involves GPC's failure in erroneously attributing DG start record keeping practices as a reason for the difference between the DG starts reported in April 19 LER and in the June 29 LER revision. The root cause of this failure was that GPC acted with careless disregard when it failed to adequately determine the root cause for the reporting errors on April 9 and April 19 and, as a result, stated reasons in the cover letter that were inaccurate. The inaccuracy was material in that it could have led the NRC

to conclude that the correct root causes for the difference in the number of diesel starts reported in the April 19 LER and the June 29 letter had been identified by GPC.

The third example involves GPC's failure to state that the root causes for the difference between the DG start counts in the April 19 LER and the June 29 letter were personnel errors. The root cause for this failure was that GPC acted with careless disregard when it failed to adequately determine the root cause for the reporting errors on April 9 and April 19 and, as a result, stated reasons in the cover letter that were incomplete. The incompleteness was material in that, had the correct root causes for the differences in the number of diesel starts been reported in the April 19 LER and the June 29 letter, it could have led the NRC to seek further information.

GPC Response:

GPC admits that the June 29, 1990 letter was incomplete, but denies that GPC staff or management acted with careless disregard. See GPC Reply to Notice of Violation, EA 93-304, Violation D, pp. 24-25; see also GPC's Response to Intervenor's Second Request for Admissions, July 29, 1994, Responses to Allegation No. 4, Evidentiary Statements Nos. 6, 11, 18, 20, 25, 35, 36, 37, 41, and 43.

2. OI Conclusion for Allegation No. 4:

Based upon the evidence developed during the investigation, it is concluded that HAIRSTON, with, at a minimum of careless disregard, submitted a false statement to the NRC in the letter of transmittal of Revision 1 to LER 90-006, dated June 29, 1990. This false statement pertained to the reasons stated as to why the GPC statement of diesel testing in the original LER 90-006 was inaccurate.

GPC Response:

GPC interprets the phrase "false statement pertained to the reasons stated as to why the GPC statement of diesel testing in the original LER" as referring to OI's conclusion (p. 77 of OI Report 2-90-020R) that "diesel record keeping practices had nothing to do with the difference" in start count numbers between the original LER and the revised LER.

GPC denies that Hairston acted with careless disregard and that the statement was false as analyzed by OI. See, NRC Vogtle Coordinating Group Analysis, at 31, see, also, GPC's Response to Coordinating Group Conclusion for Allegation No. 4, supra.

D. Response to Request to Admit Allegation No. 5 Conclusions.

1. Coordinating Group Conclusion No. 5:

The Group concluded that GPC failed to provide complete information with respect to the root causes of the error in the April 9 letter and the April 19 LER. The August 30 letter stated that the error in the April 9 letter and presentation (and the April 19 LER) were caused, in part, by an error made by the individual who performed the count of DG starts (CASH). This statement is incomplete in that it failed to identify all personnel errors made by BOCKHOLD and CASH. The root cause of the incompleteness was the failure of GPC to exercise reasonable care in adequately identifying the causes for the error in the April 9 and the April 19 LER. The incompleteness was material in that, had the correct root causes for the error in the April 9 letter regarding DG start counts been reported, this information could have led the NRC to seek further information.

GPC also failed to provide accurate information with respect to the correct root cause of the errors in the April 9 letter. The August 30 letter also stated that the errors in the April 9 letter and presentation

(and the April 19 LER) were caused, in part, by confusion in the distinction between a successful start and a valid test. This information was inaccurate. The root cause for providing this inaccurate information was careless disregard displayed by BOCKHOLD after concerns about the accuracy of the statement were raised. The inaccuracy was material in that it could have led the NRC to conclude that the correct root causes for the error in the April 9 letter had been identified by GPC.

GPC Response:

GPC denies the conclusion reached by the Coordinating Group. See GPC's Reply to Notice of Violation EA 93-304, Violation E; see also GPC's Response to Intervenor's Second Request for Admissions, July 29, 1994, Responses to Allegation No. 4, Evidentiary Statement No. 25.

2. OI Conclusion for Allegation No. 5:

Based upon the evidence developed in this investigation, it is concluded that McCOY, with, at a minimum of careless disregard, submitted both a false and a misleading statement in the GPC CLARIFICATION OF CONFIRMATION OF ACTION RESPONSE letter to NRC, dated August 30, 1990. These false and misleading statements pertained to the reasons why the statement of diesel testing in the GPC Confirmation of Action Response letter, dated April 9, 1990, was inaccurate.

GPC Response:

GPC denies this conclusion. See GPC's Reply to Notice of Violation EA 93-304, Violation E; see also GPC's Response to Intervenor's First Request for Admissions, dated July 7, 1994, Allegation 5, Evidentiary Finding No. 5; Vogtle Coordinating Group's Analysis at 39-40.

E. Response to Request to Admit Allegation No. 6 Conclusions.

1. Coordinating Group Conclusion for Allegation No. 6

GPC failed to include information regarding DG starting air quality in its April 9, 1990, letter to the NRC regarding restart of Vogtle Unit 1. The incompleteness was material in that the NRC relied, in part, upon the information presented by GPC in its letter of April 9 in reaching the decision to allow Unit 1 to return to power operation.

GPC Response:

GPC denies the conclusion. See GPC's Reply to NRC Notice of Violation EA 93-304, Violation B; see also GPC's Response to Intervenor's First Request for Admissions, dated July 7, 1994, Allegation 5, Evidentiary Findings Nos. 3 and 9.

2. OI Conclusion for Allegation No. 6

Based upon the evidence developed in this investigation, it is concluded that BOCKHOLD had knowledge, at the time of his oral presentation to NRC on April 9, 1990, that there continued to be out-of-tolerance dewpoint readings on the control air of the VEGP, Unit 2 EDGs as recently as the day before his presentation. In addition, BOCKHOLD knew that GPC, as part of their justification for restart of Unit 1, was claiming that VEGP EDG was satisfactory, and that GPC was attributing their bad dewpoint readings to faulty instrumentation. BOCKHOLD deliberately withheld from NRC, his knowledge of the relevant, material information regarding the recent bad dewpoint readings, and permitted the GPC claims of satisfactory air quality, and bad readings due to faulty instrumentation, to be issued in the GPC April 9, 1990, letter of response to the NRC Confirmation of Action.

GPC Response:

GPC denies the conclusion that Bockhold deliberately withheld from the NRC his knowledge of recent bad dewpoints. See GPC's Reply to NRC Notice of Violation EA 93-304, Violation B; Vogtle Coordinating Group Analysis, at 44; see also GPC's Response to Intervenor's First Request for Admissions, dated July 7, 1994, Allegation 6, Evidentiary Findings Nos. 1 and 3.

F. Response to Request to Admit Allegation No. 7 Conclusions.

1. Coordinating Group Conclusion for Allegation No. 7

The Group concluded that there is a reasonable basis for the information submitted by GPC in its April 1, 1991, response to the MOSBAUGH and HOBBY 10 C.F.R. § 2.206 petition and the allegation. Therefore, the Group could not conclude that GPC submitted inaccurate information, as alleged.

GPC Response:

GPC admits this conclusion in that there is a reasonable basis for the information submitted by GPC in its April 1, 1991 response.

2. OI Conclusion for Allegation No. 7

Based upon the evidence developed in this investigation, it is concluded that McDONALD, as the sworn signatory of the GPC Response to the MOSBAUGH/HOBBY 2.206 Petition, dated April 1, 1991, provided inaccurate information to NRC by stating in the Response that HAIRSTON was not a participant in the late afternoon conference call on April 19, 1990, in which the wording of GPC LER 90-006 was revised by corporate and site representatives. The audio tape of that conference call established that HAIRSTON was not only a participant in a portion of that call, but that he addressed the issue of EDG starts and "trips" as they applied to the LER.

It could not be established that McDONALD was aware that HAIRSTON was a party to the telephone call on April 19, 1990, and deliberately provided false information to the NRC.

GPC Response:

GPC denies this conclusion. See Vogtle Coordinating Group Analysis, at 46-47; see also GPC Response to Intervenor's First Request for Admissions, dated July 7, 1994, Allegation 7, Evidentiary Findings Nos. 1, 2, 3, 4, 5, 6, and 9.

G. Response to Request to Admit Review of Audio Tapes.

1. OI Conclusion for Investigative Review of Audio Tapes

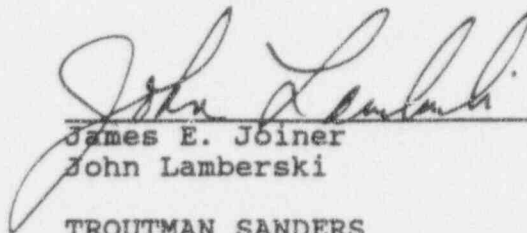
It is also concluded from the combination of the above findings, and the overall review, by OI, NRC, of the numerous audio tape recordings of internal GPC conversations regarding their communications with the NRC on a range of issues, that, at least in the March-August 1990 time frame, there was evidence of a closed, deceptive, adversarial attitude toward NRC on the part of GPC senior management. This attitude fostered a noticeable degree of frustration on the part of various GPC Technical Support and Engineering personnel with respect to the GPC provision of information, not known to NRC, that had the potential of resulting in NRC enforcement action.

GPC Response:

GPC denies this conclusion, which has no reliable and probative basis. See Vogtle Coordinating Group Analysis, at 47-48; see also GPC Response to Intervenor's First Request for Admissions, dated July 7, 1994, Section H, "Response to Evidentiary Findings for Investigative Conclusion from Review of Audio Tapes," Evidentiary Findings Nos. 1, 2, 3, 4, 6, 7, 8, 9, 12, 13, 15 and

objections to Nos. 10, 11 and 16-26; July 20, 1990 letter from Stewart Ebnetter, NRC Region II Administrator, to Mr. W.G. Hairston, III referenced in GPC Reply to Notice of Violation.

Dated: August 10, 1994



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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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| | : | Re: License Amendment |
| (Vogtle Electric Generating Plant, | : | (Transfer to |
| Units 1 and 2) | : | Southern Nuclear) |
| | : | |
| | : | ASLBP NO. 93-671-OLA-3 |

AFFIDAVIT OF MARK J. AJLUNI

I, Mark J. Ajluni, being duly sworn, state as follows:

1. I am currently employed by Southern Nuclear Operating Company as Senior Project Engineer, Vogtle Project.

2. I have been expressly authorized to verify Georgia Power Company's Additional Response to Intervenor's Second Request for Admissions. Specifically I am duly authorized to respond on behalf of the Company to the Second Request for Admissions for conclusions contained in the Nuclear Regulatory Commission's Vogtle Coordinating Group Report, dated February 9, 1994, and for conclusions contained in the Nuclear Regulatory Commission, Office of Investigations Report 2-90-020R, dated December 17, 1993.

I hereby certify that the statements and opinions in such responses are true and correct to the best of my personal knowledge and belief.

Mark J. Ajluni

Mark J. Ajluni

SWORN TO and subscribed before
me this 10 day of August,
1994.

Singer Carter
NOTARY PUBLIC

My Commission Expires:

MY COMMISSION EXPIRES JANUARY 12, 1997

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Docket Nos. 50-424-OLA-3  
50-425-OLA-3

Re: License Amendment  
(Transfer to Southern  
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ASLBP No. 93-671-01-OLA-3

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
0-424-OLA-3

Thomas L. Penland, Jr.

Dated: August 10, 1994



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NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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