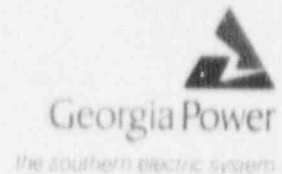


Georgia Power Company
40 Inverness Center Parkway
Post Office Box 1205
Birmingham, Alabama 35201
Telephone 205 877-7122

C. K. McCoy
Vice President, Nuclear
Vogtle Project



April 19, 1991

ELV-02741
0936

Docket Nos. 50-424
50-425

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

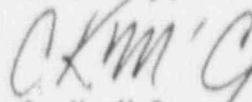
Gentlemen:

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 Reports 50-424/91-04 and 50-425/91-04 which concerns the inspection conducted by Mr. A. Gooden of the NRC during February 18-22, 1991. In the enclosure, transcription of the violation precedes GPC's response.

Please contact this office if you have any questions.

Sincerely,


C. K. McCoy

CKM/JLL/gmb

Enclosure: Violation 50-424/91-04 and 50-425/91-04 and GPC Response

c(w): Georgia Power Company
Mr. W. B. Shipman
Mr. S. H. Chesnut
Mr. P. D. Rushton
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

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ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 NRC NOTICE OF VIOLATION 50-424/91-04 AND 50-425/91-04 AND GPC RESPONSE

"10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect Emergency Plans which meet the standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR Part 50.

Section H.1.3 of the Vogtle Emergency Plan states that "the EOF is sealed and maintained at a positive pressure with respect to atmospheric pressure."

Contrary to the above, during a surveillance test on February 13, 1990, positive pressure did not occur. Further, as of February 22, 1991, the EOF Ventilation System had not been restored to function as designed and remained incapable of maintaining a positive pressure. Consequently, for more than a year, the EOF ventilation system has not functioned in accordance with the Emergency Plan.

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

RESPONSE TO VIOLATION 50-424,425/91-04

Admission or Denial of the Violation:

The violation occurred as stated in the notice of violation above.

Reason for the Violation:

In February 1990, maintenance work order (MWO) A9000236 was written identifying several problems with the emergency operating facility (EOF) heat ventilation and air conditioning (HVAC). These problems included the inability to achieve a positive pressure in the EOF. This MWO was not identified as being associated with the Emergency Plan and was not given sufficient management attention.

Corrective Steps Which Have Been Taken and the Results Achieved:

1. A historical review of the nuclear plant management information system (NPMIS) database was conducted. This review determined that the MWOs associated with the EOF were not given appropriate high priority because they were not identified as Emergency Plan items.
2. The responsibility to maintain the emergency response facilities (ERF) was reemphasized to the appropriate management personnel to assure that future MWOs will be assigned the proper priority.
3. The EOF HVAC surveillance 54039-301 was completed satisfactorily on March 13, 1991. This surveillance proved the capability of the EOF HVAC system to provide a positive pressure with respect to outside atmosphere as stated in the Emergency Plan.

ENCLOSURE (CONTINUED)

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2
NRC NOTICE OF VIOLATION 50-424/91-04 AND 50-425/91-04 AND GPC RESPONSE

4. Procedure 54039-C, "EOF Filtration System HEPA Filters Test," was added to the surveillance tracking database to ensure the EOF ventilation surveillance testing will be completed within the designated testing frequency and will be tracked with the management attention list. Surveillance testing for other ERF facilities were previously included in the surveillance tracking database.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

No further actions are warranted; the actions mentioned above are sufficient to avoid any further violations.

Date When Full Compliance Will Be Achieved:

Compliance was achieved on March 13, 1991 when surveillance 54039-301 was satisfactorily completed and signed off.