

Georgia Power Company
40 Inverness Center Parkway
Post Office Box 1296
Birmingham, Alabama 35201
Telephone 205 877-7122

C. K. McCoy
Vice President, Nuclear
Vogtle Project



June 4, 1991

ELV-02857
0990

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 DEVIATION

As requested in NRC letter dated May 6, 1991, Georgia Power Company (GPC) submits the enclosed information in response to deviations identified in Inspection Report 50-424/91-07 and 50-425/91-07 which concerns the inspection conducted by Mr. B. R. Bonser of the NRC from March 24 - April 20, 1991. In the enclosure, transcription of the deviations precedes GPC's response.

Please contact this office if you have any questions.

Sincerely,

C. K. McCoy
C. K. McCoy

CKM/JLL/gmb

Enclosure: Deviations 50-424/91-07-01 and 50-425/91-07-01 and GPC Response

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

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ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 NRC NOTICE OF DEVIATIONS 50-424/91-07-01 AND 50-425/91-07-01 AND GPC RESPONSE

"FSAR Section 1.9.140.1, 9.4.4.1.3, 9.4.1.1.3 and 9.4.3.1.1.3 require conformance to Regulatory Guide 1.140 for normal air filtration units and absorber units located in the turbine building, the onsite technical support center (TSC) portion of the control building and the auxiliary building ventilation systems.

Regulatory Guide 1.140, Design, Testing And Maintenance Criteria for Normal Ventilation Exhaust System Air Filtration and Adsorption Units of Light-Water Cooled Nuclear Power Plants, requires HEPA filter sections and activated carbon absorber sections to be tested in place initially and at intervals of approximately 18 months thereafter.

Contrary to the above, the following deviations from the FSAR were identified:

- In place testing of the onsite TSC Heating Ventilation Air Conditioning (HVAC) system was last performed satisfactorily in May 1988 and was not performed satisfactorily until April 1991.
- In place testing of the Unit 2 auxiliary building normal ventilation system filters was last performed satisfactorily in January 1989 and has not been reperformed satisfactorily.
- In place testing of the Unit 1 steam jet air ejector filtration unit has never been performed and records of an initial test of this unit were not available.
- In place testing of the Unit 1 steam packing exhaust filtration unit has never been performed and records of an initial test of this unit were not available.
- In place testing of the Unit 2 steam jet air ejector filtration unit was not performed satisfactorily until April 1991. Records of an initial test of this unit were not available.
- In place testing of the Unit 2 steam packing exhaust filtration unit was not performed satisfactorily until April 1991 and records of an initial test of this unit were not available."

RESPONSE TO DEVIATIONS 50-424,425/90-07-01

Reason for the Deviations:

The deviations occurred because inadequate priority was placed on performance of these non-Technical Specification surveillances. The initial testing of the above mentioned systems was assigned to contract personnel; however, no records

ENCLOSURE (CONTINUED)

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2
NRC NOTICE OF DEVIATIONS 50-424/91-07-01 AND 50-425/91-07-01 AND GPC RESPONSE

of the testing could be found. A contributing factor was the deletion of certain work activities, including non-Technical Specification related surveillances, from the management attention and overdue surveillance tracking lists. Consequently, these deferred surveillances were not brought to management's attention in a timely manner.

Corrective Steps Which Have Been Taken and the Results Achieved:

1. Testing for all the filtration units identified in the Notice of Deviation has been completed except for the following:
 - o In place testing of the Unit 2 auxiliary building normal ventilation system filters is scheduled to be conducted in June, 1991.
 - o In place testing of the Unit 1 steam jet air ejector filtration unit is scheduled to be conducted by August 31, 1991 after resolution of moisture intrusion problems.
 - o In place testing of the Unit 1 steam packing exhaust filtration unit is scheduled to be conducted by August 31, 1991 after resolution of moisture intrusion problems.
2. The assignment of priorities for performing non-Technical Specification surveillances in a timely manner has been emphasized to appropriate personnel.

Corrective Steps Which Will Be Taken To Avoid Further Deviations:

1. These non-Technical Specification surveillances will be tracked and reported to management using the same tracking system as Technical Specification surveillances to ensure completion within the allowable time period.
2. A broadness review will be conducted to ensure any similar regulatory commitments are included in an appropriate tracking system.

Date When Corrective Action Will Be Completed:

The above corrective actions are scheduled to be completed by August 1991.