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NUDOCS  
PDR



George Bockhold  
General Manager  
Nuclear Technical Services

Southern Nuclear Operating Company  
*the southern electric system*

February 1, 1995

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

RE: Georgia Power Company, Vogtle Electric Generating Company Units 1 and 2;  
NRC Demand for Information Regarding George Bockhold, Jr. (EA 94-037)  
Supplement

Dear Mr. Lieberman:

On August 5, 1994, I submitted to you my personal response to the Demand for Information sent to Georgia Power which concerned my actions on several occasions in April through August, 1990, in providing information to the NRC. As indicated in my prior response, I met with the Senior Vice President of Georgia Power and my immediate supervisor at Southern Nuclear and we collectively reviewed my actions and responsibilities with respect to these events. We discussed my personal performance failures to assure that I carried out my responsibilities. Those responsibilities as a manager included a responsibility to assure that I understood the factual basis of the information which is communicated to the NRC. In my personal response to the Demand for Information I did my level best to explain the facts and circumstances surrounding these events and to convey to the NRC the reliance which I placed on others because of my position as General Manager. I also concluded that I did not believe that I could have reasonably been expected to have foreseen the inaccurate or incomplete information provided to the NRC. As a result of settlement discussions between counsel for the licensee and counsel for the NRC Staff I understand that the Staff, after additional review of my response to the Demand for Information and other information, remains concerned with a perceived unwillingness on my part to accept responsibility for my role in these events.

The events since 1990 have had a profound impact on me. Aside from the purely personal impact, the events of the last several months have helped me identify my capabilities and weaknesses. I am more appreciative of your perspective now than I was when my DFI Response was filed. Indeed, that filing was my first opportunity to state my views to you in writing and it is clear to me that I did not convey my heartfelt realizations that certain of my traits -- which in 1990 I viewed as only strengths -- can be perceived as major weaknesses. Why have I apparently failed once again to communicate my intended message to the NRC?

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Apparently by focusing in my DFI response on the actions which I considered reasonable at the time, my perspective appears defensive, self-serving, and, to some, may border on being arrogant. Let me state plainly that I accept personal accountability and responsibility for my actions and regret any perception of arrogance. I was the Plant Manager and both the benefits and burdens of that office are mine to shoulder. This letter emphasizes my awareness and acceptance of my performance weaknesses and failures which, in the context of providing information and fulfilling legitimate expectations of the NRC, contributed to Georgia Power's noncompliances in 1990. I hope that it unequivocally shows that my DFI response was not intended to justify my performance in 1990, or treat lightly the importance of accurate communications with the NRC.

Even though a general manager must delegate specific tasks in the gathering and collating of information to be provided to the NRC, he or she has an overriding obligation to understand the factual basis of that information. In retrospect, I failed to ensure that the data provided to me was the information which I asked for and intended to present. I did not have an adequate understanding of the numbers, and I cannot recall obtaining a detailed explanation of what the numbers specifically represented. I also realize that while it was not significant to me whether there were 19 or 12 starts on the 1B diesel generator, the difference of those two numbers, in the context of a decision on the restart of a nuclear power plant, had the capability of influencing the agency. Viewed from the NRC's perspective, while I would have been satisfied with 12, the controlling issue is whether such a number would have satisfied the NRC.

With respect to the April 19, 1990 LER, I relied upon the prior count used on April 9. Instead of reinforcing my staff to complete their verification of diesel start counts, I now realize based upon information not available to me in 1990, my statements contributed to a lax verification effort. More significant, however, was my reliance on my own analysis that since I believed only "successful starts" were included in the April 9 data and the data reflected activities after overhaul and sensor calibration and logic testing, any "problem" starts would be excluded from the count. This was an extrapolation from my understanding rather than a complete reexamination of the underlying facts. As a general manager, knowing that the information was to be communicated to the NRC, I should have applied a higher standard of care. I agree with the licensee's judgment that I acted unreasonably when I allowed the term "comprehensive test program" of the control systems and the earlier start count to be included in the LER knowing that my staff had not completed their verification effort. Licensee Event Reports are important documents which must be verified correct by practices designed to assure that they are as accurate and complete as they possibly can be.

With respect to the June 29, 1990 cover letter, I could have done more in this situation

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to assure a more complete document. I reviewed and approved this letter. The cover letter as I interpreted it was consistent with my personal knowledge. I do not recall a specific opportunity to step in and resolve the matter of the meaning of "comprehensive test program of the control systems" prior to June, 1990. Nonetheless, given the normal LER approval process and the June efforts of the SAER group, I conceivably missed an opportunity to rectify any misunderstanding associated with that phrase. I should have told the drafters, and the cover letter should have specifically indicated, what my original meaning of the phrase was at the time. Had I assured that their information was complete, we collectively might have recognized that the correction of June 29 did not address and correct the underlying problem in the April 9 letter.

Finally, in my personal DFI response, I stated that the language of the August 30, 1990 letter cannot reasonably be construed as identifying one of the causes of the error in the April 9, 1990 letter as the counter's confusion in terminology. On reflection, it would be reasonable for the NRC to conclude otherwise. It is clear that I directed the modified wording in this letter. Unfortunately, the wording was subsequently interpreted by the NRC as stating that the start counter's confusion caused the error in the April 9 letter. Therefore, I, personally and solely, am responsible for this inaccuracy which the NRC has concluded is present in this letter. In this instance, I should have permitted greater care and a fuller articulation of the matter by those who had taken the time to comprehensively review the issue. I had no greater ability than they in crafting a precise, clear and understandable letter. It was an important matter and my actions should have been more cautious.

I appreciate that the NRC is dependent upon licensees for the accuracy and completeness of information, and must have reasonable assurance of my willingness to conduct my activities in accordance with all NRC requirements. Since providing you with my personal response, Georgia Power has concluded that I acted unreasonably when I allowed the term "comprehensive test program of the control systems," to be associated with the diesel generator "start count" provided to me in early April to be included in an April 19, 1990 LER. I stated in my personal Demand for Information response that I have learned a valuable lesson from this experience; it has been underscored. I also stated that my performance over the past several years has reflected this lesson learned. My performance today, over four years after the underlying events, reflects a more mature person who is open to contrary views and cautious in formulating conclusions. I recognize that I do not know as much as I sometimes used to think I did. I would like to continue to be employed in my present position providing support to the plants until such time as I have reacquired the confidence of the licensee and my employer. Based upon recent events, I understand that additional assurance is also required by the NRC.

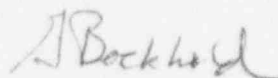
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To provide this additional assurance, I have requested my employer to provide me with an opportunity for intensive training in two areas: a manager's obligations and responsibilities in the nuclear industry and as a communicator with co-workers and regulatory agencies. I will notify you after I have completed this effort. I have also requested that my immediate supervisor meet quarterly with me to review my performance in the areas of communication effectiveness, attention to detail, accountability for actions, and any other standard which my employer identifies. I will not seek a line management position over licensed activities at any nuclear plant licensed by you until after satisfactory completion of this training. Thereafter, if I am nominated for a position in line management within three (3) years of this letter, I will inform you of that nomination at least sixty (60) days prior to assuming the position. With these additional steps on improving my management style, and reinforcement of my current sensitivity to the very high standard legitimately required of the NRC in communications, the NRC can have confidence in my involvement in licensed activities in the future.

Very truly yours,



George Bockhold, Jr.

- xc: U.S. Nuclear Regulatory Commission  
Mr. S. D. Ebner, Regional Administrator  
Assistant General Counsel for Hearings and Enforcement
- xc: Georgia Power Company  
Mr. H. A. Franklin  
Mr. W. G. Hairston, III  
Mr. J. D. Woodard
- xc: Southern Nuclear  
Mr. L. B. Long