

Georgia Power Company
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 877-7122

C. K. McCoy
Vice President, Nuclear
Vogtle Project



December 29, 1994

LCV-0505-B

Docket No. 50-424
50-425

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

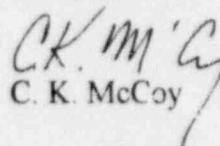
Ladies and Gentlemen:

**VOGTLE ELECTRIC GENERATING PLANT
REPLY TO A NOTICE OF VIOLATIONS**

Pursuant to 10 CFR 2.201, Georgia Power Company submits the enclosed information in response to a violations identified in Inspection Report Nos. 50-424;425/94-26 which concerns the inspection conducted by the VEGP NRC Resident Inspectors from October 16 - November 19, 1994.

Should you have any questions feel free to contact this office.

Sincerely,

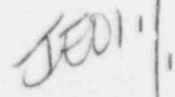

C. K. McCoy

CKM/AFS/afs

Enclosure: Reply to NOV 94-26

cc: Georgia Power Company
Mr. J. B. 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



ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO A NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424;425/94-26

The following is a transcription of the violation as cited in the Notice of Violation (NOV):

"During the NRC inspection conducted on October 16 through November 19, 1994, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," the first of the two violations is listed below:

- A. License Condition 2(E) to License No. NPF-68 issued March 16, 1987, and License No. NPF-81 issued March 31, 1989, requires the licensee to fully implement all provisions of the NRC approved "Alvin W. Vogtle Nuclear Plant Physical Security Plan."

Technical Specification 6.7.1.c requires that written procedures shall be established, implemented, and maintained covering the activities under the Security Plan.

Paragraph 6.5.B of the Physical Security Plan requires that a security officer be posted to provide visual surveillance of an affected zone or alarm point with communication to the Central Alarm Station or Secondary Alarm Station. The officer is to remain on the post until adequate measures are taken to restore the affected system to its required effectiveness.

Procedure 90106-C, Compensatory Measures For Degraded Security Systems, Step 4.6, states that a degraded vital area (VA) intrusion detection system (i.e., alarmed VA door), shall be compensated by posting an armed nuclear officer in direct view of the compensatory point until the system is returned to normal operations.

Contrary to the above, on June 14, 1994, with the VA alarm system degraded as part of biannual preventative maintenance, security did not compensate for four alarmed VA doors by posting an armed nuclear security officer in direct view of the compensatory point.

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

RESPONSE TO VIOLATION A (50-424;425/94-26-01)

Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424;425/94-26

Reason for the Violation:

This violation was attributed to a failure to provide adequate compensatory posting requirements for the NSCW towers inner ring doors. Compensatory posting of these vital area doors was accomplished in accordance with processes that did not provide adequate guidance.

Corrective Steps Which Have Been Taken and the Results Achieved:

1. On November 18, 1994, the NSCW towers for both Units 1 & 2 were searched to ensure that no evidence of tampering or sabotage of the subject area was evident. The search concluded that the vital equipment that could be accessed by these doors, had not been tampered with. The referenced doors were found to be locked. They have been maintained in a locked condition and require security personnel to unlock these doors prior to entry.
2. Security management provided guidance on November 22, 1994, to the shift captains that the referenced doors would be posted whenever conditions dictate the necessity of posting vital area doors. Additionally, details of this violation were provided to security officers as a "Lessons Learned" to ensure they are cognizant of the posting requirements for the noted doors.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

1. During future conditions that require compensatory measures for vital area doors alarm or access, the NSCW towers' inner ring doors will be compensated as any other vital area door.
2. A standard operating procedure detailing full compensatory posting requirements is expected to be issued by January 1, 1995.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on November 22, 1994 when the Security Shift Captains were advised to provide standard compensatory posting measures to the NSCW towers' inner ring doors when required per existing regulatory commitments.

ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424;425/94-26

The following is a transcription of the second violation as cited in the Notice of Violation (NOV):

"During the NRC inspection conducted on October 16 through November 19, 1994, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," the second of the two violations is listed below:

- B. 10 CFR Part 50, Appendix B, Criterion III, "Design Control" requires, in part, that design control measure shall provide for verifying or checking the adequacy of design, such as by the performance of design reviews. Design changes, including field changes, shall be subject to design control measures commensurate with those applied to the original design.

Contrary to the above, the license failed to ensure that design control measures provided for verification of the adequacy of a design change to delete the Unit 1 electrical penetration area filtration and exhaust system. This resulted in disabling the automatic and manual function of the Piping Penetration Area Filtration and Exhaust System (PPAFES) train "A" and "B" exhaust dampers. The exhaust function of the PPAFES was in a degraded condition for approximately nine days.

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

RESPONSE TO VIOLATION B (50-424;425/94-26-02)

Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

Reason for the Violation:

This violation was attributed to a design change process that did not identify that circuits for both the Electrical Penetration HVAC System and piping penetration area filtration exhaust system (PPAFES) were contained on the same circuit cards. Consequently, personnel pulling the circuit cards while implementing a design change to abandon the Unit 1 Electrical Penetration HVAC system were not aware that PPAFES components would be affected by their actions.

ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424;425/94-26

Inadequacies in the design controls process that contributed to this violation included:

- 1) The engineer reviewing the design change was accustomed to seeing a continuation symbol on interconnection wiring diagrams (IWDs) when circuits other than those shown on the drawing are affected. In fact, the continuation symbol was often used by the original designer as an engineering aid to reference other circuit drawings. However, this aid was not applied on all similar drawings and was not on the drawing legend as a standard symbol. The lack of this symbol on the affected drawings led the reviewing engineer to believe that no other circuits were affected.
- 2) A card load list, which shows all circuits affected by specific cards, was not considered to be current by the reviewing engineers, and was not used during the review.
- 3) The design change itself was originally designated as a "minor design change" (MDC), since the change was initially considered to be a minor modification and because the system was not in use. When the scope of the change later expanded, the additional scope did not receive an appropriate engineering review.

Additionally, a separate problem was identified. In March 1994, an action item dealing with the 7300 system card load list was prematurely closed prior to corrective action being adequately implemented. Also, it was found that the policy for revising vendor drawings was inadequate to maintain these documents as current and up-to-date as the users would have preferred.

Corrective Steps Which Have Been Taken and the Results Achieved:

- 1) The two circuit cards involved were reinstalled and both trains of PPAFES were restored to service on October 28, 1994. All work associated with the Electrical Penetration HVAC System deletion was halted until appropriate corrective actions and reviews were completed.
- 2) The IWDs involved were corrected to include card continuation symbol, and the symbol was added to the drawing legend to standardize the use of this engineering aid.
- 3) The card load list has been updated. Appropriate personnel have been advised that the card load list is current and will be maintained current for use during future design changes.

ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424;425/94-26

- 4) All minor design changes available to be implemented were placed on hold, then screened to determine if additional engineering review should be performed. There were sixty-nine minor design changes screened with four requiring an additional engineering review.
- 5) The process for closing corrective action items was reviewed and responsible department supervision and managers were instructed that action items would not be closed by another process (i.e.: MWO, DCP, etc.). Actual implementation of the corrective action item would be required prior to action item being closed. This action should prevent the premature closure of actions items prior to actual corrective action implementation.
- 6) The procedure for minor design changes has been revised to strengthen the controls for engineering reviews and to address the need for additional reviews when scope changes occur.
- 7) Corporate management is now on routine distribution for documents that describe plant operational events.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

- 1) Other 7300 system IWDs are being reviewed and continuation symbols are being added as needed. This is expected to be completed by January 31, 1995.
- 2) The policy of categorizing drawings is being reviewed to address both the frequency of drawing updates, and the need to develop a clear distinction between design and reference documents. These actions are being initiated to ensure design configuration control and will be completed by June 30, 1995.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on October 28, 1994 at 1030 EDT, when the circuit cards were reinstalled and Train A of PPAFES was restored to service.