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W. G. Hairston, III
Executive Vice President
Nuclear Operations

May 11, 1994

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

DOCKETED
USNRC

'95 MAY -3 P2:49
U.S. Southern Electric System

50-424/425-OLA-3
4/20/95

A-19A

TO ALL GEORGIA POWER EMPLOYEES

By now each of you have been made aware of the recent Notice of Violation and proposed imposition of a \$200,000 civil penalty against Georgia Power Company. The Company is still evaluating this document, both its factual conclusions and the legal options, and will prepare an appropriate response. The purpose of this letter, though, is to assure all of our employees that Georgia Power Company remains firmly committed to a full, open, complete and accurate communications policy with the Nuclear Regulatory Commission, any of the Company's regulatory authorities, and with each other. Regardless of the outcome of the Notice of Violation, all of us should consider it our personal responsibility that when called upon to communicate with the Nuclear Regulatory Commission or its staff, whether orally or in writing, we will do our best to ensure that the information provided is complete and accurate in all material respects. This is our obligation by law, this is our obligation by the terms of our licenses, but more importantly, it is the right thing to do.

We should all remember, and take seriously, that the policy of Georgia Power Company is to conduct its business affairs in an honest, ethical manner and to comply with all laws and regulations affecting the Company. Important to our success as a company is our success at compliance with our legal obligations.

If you have a concern which you wish to raise, then you are encouraged to do so. Georgia Power Company's policy is to encourage its employees, and employees of its contractors, to communicate their concerns to their supervisors, which they are free to do at any time. If an employee concern cannot be resolved through this traditional channel, or if the employee wishes to pursue the matters through the concerns program, then use of that program is encouraged. In short, the Company wants you to feel free to raise any concern which you may have and has provided

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NUCLEAR REGULATORY COMMISSION

Docket No. 50-424-OLA-3 Official Exh. No. GPC 19A
50-425-OLA-3
 In the matter of Vogtle Units 1+2
 Staff IDENTIFIED
 Applicant ✓ RECEIVED ✓
 Intervenor REJECTED
 Cont'g Off'r _____
 Contractor _____ DATE 04-20-85
 Other _____ Witness Houston
 Reporter J. Zisk

All Georgia Power Employees
May 11, 1994

multiple ways for you to do so. You will be treated with respect, you will be treated with courtesy, and a fair and reasonable response will be provided promptly and completely. Of course, you may always go directly to the Nuclear Regulatory Commission if you wish and the way to do this, as well as the relevant phone numbers, is posted on numerous bulletin boards throughout the work areas. Rest assured that you may raise your concerns without any fear of penalty or retaliation.

Let's all work together as a team, and dedicate ourselves to safe and efficient nuclear plant operations. We all have a community of interest in the success of our company, we all have a community of interest in full, open, complete and accurate communication with ourselves and with our regulatory authorities. Let's pursue these goals to the best of our individual abilities.

W. G. Hairston III

W.G. Hairston, III

YOGTLE

5/11/94 4:15 p.m.

I. DISCUSSION OF POLICY OF OPEN COMMUNICATION AND THE LETTER TO ALL EMPLOYEES

By now each of you have been made aware of the recent Notice of Violation and proposed imposition of a \$200,000 civil penalty against Georgia Power Company. The Company is still evaluating this document, both its factual conclusions and the legal options, and it will prepare an appropriate response. The purpose of this meeting, though, is to ensure you all that Georgia Power Company remains firmly committed to a full, open, complete and accurate communication policy with the Nuclear Regulatory Commission, any of the Company's regulatory authorities, and with each other. Regardless of the outcome of the Notice of Violation, all of us should consider it our personal responsibility that when called upon to communicate with the Nuclear Regulatory Commission or its staff, whether orally or in writing, we will do our best to ensure that the information provided is complete and accurate in all material respects. This is our obligation by law, this our obligation by the terms of our licenses, but more importantly, it is the right thing to do. I encourage you to read the Notice of Violation and read 10 CFR 50.9 which are posted on the plant bulletin board.

We should all remember and take seriously, that the policy of Georgia Power Company is to conduct its business affairs in an honest, ethical manner and to comply with all laws and regulations affecting the Company. Important to our success as a company is our success at compliance with our legal obligations.

If you have a concern which you wish to raise, then you are encouraged to do so.

Georgia Power Company's policy is to encourage its employees, and employees of its contractors, to communicate their concerns to their supervisors, which they are free to do at any time. Rest assured that you may raise your concerns without any fear of penalty or retaliation. If an employee concern cannot be resolved through this traditional channel, or if the employee wishes to pursue the matter through the concerns program, then use of that program is encouraged. In short, the Company wants you to feel free to raise any concern which you may have and has provided multiple ways for you to do so. You will be treated with respect, you will be treated with courtesy, and a fair and reasonable response will be provided promptly and completely. Of course, you may always go directly to the Nuclear Regulatory Commission if you wish, and the way to do this, as well as the relevant phone numbers, is posted on numerous bulletin boards.

II. SUMMARY OF EVENTS

In March, 1990 Vogtle Unit 1 was in a normal refueling outage with one emergency diesel generator and one offsite supply transformer tagged out of service for routine maintenance. While in this condition, a truck backed into a transmission line support for the other supply transformer for offsite power to the unit. When the remaining emergency diesel generator attempted to start, it tripped due to a false trip signal resulting in a loss of power to plant safety systems. The diesel generator was subsequently started manually to restore power until offsite power was restored.

In the investigation of the causes of this event, the issue of the reliability of the diesel generators was one of the issues which needed to be resolved prior to returning the unit to

operation. Our employees, often under the observation of NRC inspectors, conducted extensive investigations and testing of these diesels before the unit was restarted.

Subsequent to these investigations, a meeting was held with the NRC to discuss the event and all the corrective actions taken to prevent recurrence and ensure the unit was ready to return to service.

During this meeting, information was provided regarding the investigation and testing of the diesel generators which included a summary of the number of successful test starts done on each of the diesels subsequent to the investigation to demonstrate reliability. This information was gathered by plant employees and was later found by one of our employees to have been in error. This error was reported verbally to the NRC. It was several months before all the confusion and errors were resolved.

While we continue to believe that all employees honestly and diligently attempted to provide accurate and complete information to the NRC, and the Notice of Violation did not attribute the error to willful conduct, clearly there are some lessons we should learn from this experience. The purpose of this discussion is not to debate the Notice of Violation--that is still under evaluation.

III. LESSONS LEARNED

In light of this event and the NRC enforcement action, I would like to reiterate two important policies that are key to our operation:

1. We must always provide complete, accurate information regarding our operation to the NRC. This open and proactive sharing of all relevant and significant information

is essential--even if it goes beyond the scope of an information request. It is important to be precise, accurate and complete in information provided and to identify the bases and qualifications of data provided.

2. All employees have an obligation to raise any concerns they have to their supervisors, and to follow through to ensure the concerns are addressed. Supervisors and managers must be sensitive to concerns raised, and must ensure the concern is resolved and appropriate feedback is provided to the person who raised the concern. That includes any concerns about the accuracy of information. Even though we have particular employees and managers primarily responsible with developing and verifying letters, LERs and similar submittals to the NRC, each of us is responsible to call attention to any errors or inaccuracies in them. We also should suggest additional information which would assure that a complete and balanced message is being sent. Supervisors and managers, as well as co-workers, have to be sensitive to concerns raised; they must ensure that the concern is understood and resolved; and they should provide appropriate feedback to the person who raised the concern. It is sometimes not enough to resolve an issue in your mind--you need to be sure that the issue has been resolved in the other person's mind too. Sometimes you know the resolution as a matter of common sense or past experience, but you need to share that common sense or experience with your co-workers.

IV. OUR OWN SELF-INTEREST

Following our policies will obviously provide assurance that we fulfill our legal obligations under our license. Following the policies will also serve our long-term best interests on a broader scale as well. We need to be aware of those self-interests as we feel the various emotions that result from this case. Our natural, human reaction to a major proposed violation, as this one is, resulting from information which was provided to the NRC, may be draw back, to think that if less or the bare minimum of information has

been provided, or if no concern has been raised, no problem would exist today. In other words, "you can't get into trouble if you don't say nothin'."

That approach is totally at odds with our two policies. The best hopes for our industry, and the continued success of this plant, are vitally dependent on the continued trust of the public in our actions. If we do not provide accurate and complete information to the NRC, we will lose that trust. If we fail to resolve concerns once raised, we will not provide complete and accurate information to the NRC. One of the most effective means of building and keeping the trust of the public in us may well be in our communications with the NRC.