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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
Before the Atomic Safety and Licensing Board

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In the Matter of)

GEORGIA POWER COMPANY,
et al.)

(Vogtle Electric Generating
Plant, Units 1 and 2))

Docket Nos. 50-424-OLA-3
50-425-OLA-3

Re: License Amendment
(Transfer to Southern
Nuclear)

ASLBP No. 93-671-01-OLA-3

GEORGIA POWER COMPANY RESPONSE TO QUESTIONS RAISED BY
THE BOARD DURING THE DIESEL GENERATOR HEARING

The Licensing Board has requested that Georgia Power Company provide the Board with the formal diesel test plan employed in March and April of 1990 to determine the root cause of the 1A diesel generator failure on March 20, 1990. Tr. 3440-41. Judge Bloch requested that the Company provide information from the outage plan if that would help the Board understand the plan for the diesel testing. Id.; see also Tr. 3817. Judge Carpenter requested an explanation of the meaning of the term comprehensive test program of the diesel control systems as it was intended in the April 19, 1990 LER 90-006. Tr. 4051-52. In addition, the Board requested information concerning the criterion for declaring the diesel generators "Operable" in accordance with the Technical Specifications; the Board indicated it was puzzled about the criteria used to declare the diesel operable before April 9, 1990. Tr. 3433-34; see also Tr. 4326.

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Georgia Power provides herewith two affidavits: one from Mr. Kenneth R. Holmes, the Event Review Team Leader, which discusses the evolution of the test plan for the 1A diesel, following the March 20, 1990 Site Area Emergency, in order to determine the root cause of the March 20 diesel failure; and the second by Mr. George Bockhold, Jr., which describes the decision making involved with the Company's determination as of April 9, 1990, that the Vogtle Unit 1 diesels were operable and capable of performing their intended safety function.

Further, as of April 9, 1990, NRC personnel had performed an independent inspection of the Vogtle diesels and also concluded that the diesels were operable and that there was reasonable assurance the diesels were capable of performing their intended safety function. See Affidavit of Milton D. Hunt, dated March 1, 1995, attached hereto. See also NRC Staff Supplemental Response to Intervenor's First Set of Interrogatories and Request for Production of Documents (September 15, 1993), at 2-6, 9.

On April 19, 1990, Georgia Power submitted LER 90-006 to the NRC (McCoy Exhibit L; GPC Exh. II-14) which included, at P. 6, the following statement:

Numerous sensor calibrations (including jacket water temperatures), special pneumatic leak testing, and multiple engine starts and runs were performed under various conditions. After the 3-20-90 event, the control systems of both engines have been subjected to a comprehensive test program. Subsequent to this test program, DG1A and DG1B have been started at least 18 times each and no failures or problems have occurred during any of these starts. In addition, an undervoltage start test without air roll was conducted on 4-6-90 and DG1A started and loaded properly.

This language was formulated as a result of discussions between corporate and site personnel on April 19, 1990, at least some of which were captured on a tape recording made by Mr. Mosbaugh. See Tape 58 (GPC Exh. II-2), Tr. 7-9.

The term "comprehensive test program" of the control systems was not a term that had any defined historical or customary usage. While there had been extensive testing of the diesels after the site area emergency, and that testing had been discussed with the NRC, it was not documented in a single programmatic plan. The test sequence and schedule was incorporated into the outage schedule (see enclosed Holmes Affidavit) but there was no particular title given to the overall testing. The diesel generator testing that was conducted after the site area emergency was not limited to tests of the "control systems," but included other tests designed to return the diesels to operability (e.g., Sequencer Functional Test and Operability test).

Georgia Power believes that the phrase "comprehensive test program" was probably coined during discussions on April 19, 1990. At the time, Mr. Bockhold intended the phrase comprehensive test program of the diesel control systems to refer to the final sensor calibrations and logic testing of the control systems. Bockhold Prefiled Testimony at 13.¹ As stated above,

¹ Mr. Bockhold's interpretation was also known to Messrs. Mosbaugh and John Aufdenkampe at the site and Bill Shipman at the corporate office, who had been informed that this interpretation had been conveyed to the NRC's Mr. Ken Brockman. See Tape 58 (GPC Exh. II-2), Tr. 23-29.

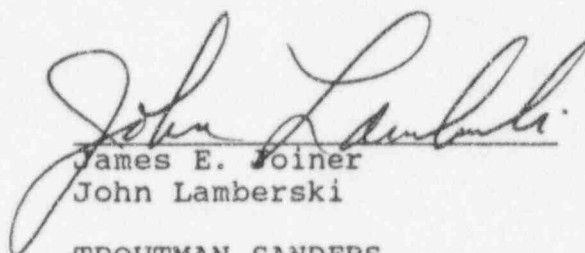
LER 90-006 stated that "the control systems . . . have been subject to a comprehensive test program" and identified a number of starts after this test program. This choice of words, however, was not precise or appropriate, because there were tests of the control systems that occurred after the sensor calibrations and logic testing. Mr. McCoy, for example, thought the phrase referred to the testing of the control systems that Georgia Power had agreed to perform before the diesels were returned to an operable state. McCoy Prefiled Testimony at 14.

Mr. McCoy has also testified that he understood on April 19, 1990 that there had been failures of the 1B diesel after March 20, 1990, but that, subsequent to those failures, there were at least 18 consecutive, successful starts of the diesels. Further, he understood that these were the same 18/19 starts referenced in the April 9 presentation and that the term "subsequent to the comprehensive test program" was added to remove any doubt that there were at least 18 starts following any of the problem starts. Id. at 12-13, 16.² Mr. McCoy contacted the NRC to confirm that they also understood this. Id. at 16; see also Interrogatory Response of Kenneth E. Brockman to the October 8, 1993 Georgia Power Company's First Set of Interrogatories and Second Request for Production of Documents to the NRC Staff (December 23, 1993), at 7-8.

² Based on information which he had received on or before April 19, 1990, Mr. McCoy did not understand that there was an error in the numbers of successful diesel starts reported in the April 9, 1990 letter or presentation. McCoy Prefiled Testimony at 16.

When George Frederick performed his audit of the number of diesel starts that had been reported in LER 90-006, he was unable to find any precise or recognized definition of the term "comprehensive test program." He therefore defined the phrase conservatively, for the purpose of his audit, as the entire test sequence leading to the operability determination. Frederick Prefiled Testimony at 6. Georgia Power management accepted this redefinition as an appropriate basis to correct the LER.

Respectfully submitted



James E. Joiner
John Lamberski

TROUTMAN SANDERS
Suite 5200
600 Peachtree Street, N.E.
Atlanta, GA 30308-2216

(404) 885-3360

Ernest L. Blake
David R. Lewis

SHAW, PITTMAN, POTTS & TROWBRIDGE
2300 N Street, N.W.
Washington, D.C. 20037

(202) 663-8084

Counsel for Georgia Power Company

Dated: May 12, 1995

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50-204-OLA-3
50-425-OLA-3

John Lamberski

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SERVICE LIST

*Administrative Judge
Peter B. Bloch, Chairman
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852

*Administrative Judge
James H. Carpenter
Atomic Safety and Licensing
Board
933 Green Point Drive
Oyster Point
Sunset Beach, NC 28468

*Administrative Judge
Thomas D. Murphy
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852

*Michael D. Kohn, Esq.
Kohn, Kohn & Colapinto, P.C.
517 Florida Avenue, N.W.
Washington, D.C. 20001

Office of Commission Appellate
Adjudication
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Stewart D. Ebnetter
Regional Administrator
USNRC, Region II
101 Marietta Street, NW
Suite 2900
Atlanta, Georgia 30303

Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, D. C. 20555
ATTN: Docketing and Ser-
vices Branch

*Charles Barth, Esq.
Mitzi Young, Esq.
Office of General Counsel
One White Flint North
Stop 15B18
U.S. Nuclear Regulatory
Commission
Washington, D. C. 20555

Director,
Environmental Protection
Division
Department of Natural
Resources
205 Butler Street, S.E.
Suite 1252
Atlanta, Georgia 30334