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May 22, 1995



LCV-0615-A

Docket No. 50-424  
50-425

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

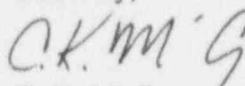
Ladies and Gentlemen:

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

Pursuant to 10 CFR 2.201, Georgia Power Company submits the enclosed information in response to a violation identified in Inspection Reports 50-424;425/95-11 which concerns the inspection conducted by the Vogtle Electric Generating Plant (VEGP) NRC Resident Inspectors from March 19, through April 15, 1995.

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

Sincerely,

  
C. K. McCoy

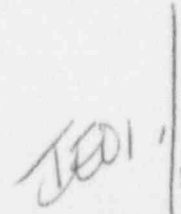
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Enclosure: Reply to NOV 50-425/95-11-01

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

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## **ENCLOSURE**

### **VOGTLE ELECTRIC GENERATING PLANT - UNIT 2 REPLY TO A NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424;425/95-11**

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

"During the NRC inspection conducted on March 19 through April 15, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below.

Technical Specification 3.9.4, Containment Building Penetrations, states that during core alterations penetrations providing direct access from the containment atmosphere to the outside atmosphere shall be either closed by an isolation valve, blind flange, or manual valve, or be capable of being closed by an operable automatic containment ventilation isolation valve.

Contrary to the above, on March 9 and 18, 1995, during core alterations, Unit 2 containment integrity was not maintained. On March 9, 1995, during core alterations, control room personnel opened reactor coolant pump #2 seal injection system containment isolation valve, 2HV-8103B, providing direct access from containment atmosphere to the outside atmosphere. On March 18, during core alterations, control room personnel opened atmospheric relief valve, 2PV-3020, providing direct access from the containment atmosphere to the outside atmosphere.

This is a Severity Level IV violation (Supplement I) (Unit 2 only)."

#### **RESPONSE TO VIOLATION (50-425/95-11-01)**

##### **Admission or Denial of the Violation:**

This violation occurred as stated in the notice of violation. The short period of time that 2HV-8103B valve was opened for valve stroke testing on March 9 and 10, 1995, represents a minimal risk for the release of radioactive materials. Similarly, the twenty-two minutes that 2PV-3020 was opened on March 18, 1995, also represents a minimal period of risk, since this pathway was partially filled with water that would have inhibited any release. Finally, during the periods involved, there were no radioactive releases in the containment building that might have led to a release of radioactive materials to the outside atmosphere. Based on these considerations, there was no adverse affect to plant safety or to the health and safety of the public as a result of this violation.

##### **Reason for the Violation:**

The cause of this violation was attributed to an inadequate tracking mechanism to follow maintenance activities still in progress or started after containment closure had been verified.

## **ENCLOSURE**

### **VOGTLE ELECTRIC GENERATING PLANT - UNIT 2 REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424;425/95-11**

Other factors that contributed to this violation were:

- 1) Inadequate re-scheduling of work affecting containment closure, prior to and during fuel movement, without appropriate tracking mechanisms.
- 2) Inadequate turnover communications among departments that controlled plant activities. Personnel working the night of March 17, 1995, understood the potential for the work on the wet lay-up line valves to affect containment closure, but this knowledge was not adequately communicated to personnel working the dayshift on March 18, 1995.
- 3) The absence of adequate coding or other means to identify work documents that may impact containment closure.

#### **Corrective Steps Which Have Been Taken and the Results Achieved:**

Control room personnel immediately closed valve 2PV-3020 at 1545 on March 18, 1995, when they received a report of water coming from the vicinity of steam generator # 3. After discussion with plant management, the decision was made to stop core alterations and review containment integrity status. This action was taken to ensure that further containment integrity breaches would not occur due to on-going maintenance and operations activities. Plant management subsequently directed that both incidents of breaching containment integrity be investigated by an Event Review Team to determine cause and propose the appropriate corrective actions to prevent recurrence.

#### **Corrective Steps Which Will Be Taken to Avoid Further Violations:**

1. Future outage scheduling will utilize work order coding to assist in minimizing the affect on containment integrity of work performed during core alterations. Appropriate surveillances, clearances, and equipment databases will be coded by February 15, 1996, as potential containment integrity impacts.
2. To prevent recurrence of this violation during future refueling outages, an improved tracking method will be implemented by February 1, 1996, to facilitate control of work activities to ensure containment integrity is maintained.
3. Discussion of this violation to stress the need for accurate documentation and shift turnovers will be presented to the appropriate operations, maintenance, and work planning personnel by September 30, 1995.

**ENCLOSURE**

**VOGTLE ELECTRIC GENERATING PLANT - UNIT 2  
REPLY TO NOTICE OF VIOLATION  
NRC INSPECTION REPORTS 50-424;425/95-11**

**Date When Full Compliance Will Be Achieved:**

Full compliance was achieved on March 10, 1995, when valve 2HV-8103B was closed following valve actuator testing, and on March 18, 1995, when valve 2PV-3020 was closed and flow to steam generator #3 was suspended.