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PRP



Georgia Power

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the southern electric system

J. T. Beckham, Jr.
Vice President and General Manager
Nuclear Generation

NED-84-178

April 5, 1984

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
101 Marietta Street, NW
Atlanta, Georgia 30303

REFERENCE:

RII: JPO

50-321/50-366 /H

50-424/50-425

IER 84-01 SALP

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

Your letter of March 6, 1984, transmitted the Systematic Assessment of Licensee Performance (SALP) Board Report for Georgia Power's nuclear program. We have reviewed that report and have the following comments concerning your evaluation.

In its introduction, the SALP report is described as "an integrated NRC staff effort to collect available observations of licensee performance on a periodic basis and evaluate performance based on these observations." We believe your evaluation of our facilities focused primarily on negative aspects of our performance. By not providing a balanced coverage of all our actions, an erroneous impression may be given to the public. We suggest the public would be provided a more balanced perception if a more comprehensive picture of what occurred during the reporting period were included. Further, a discussion of the actual safety significance of any item reported in the SALP should be provided.

In reviewing the SALP report for Plant Hatch activity, there were four occurrences which primarily contributed to the low ratings in the maintenance, operations, and quality assurance areas. Your review of these occurrences pointed out many of the problems encountered by these departments; however, in providing your analysis you sometimes neglected reporting many of GPC's corrective actions. In an effort to clarify the record and present the total picture, each of four occurrences is listed in the attachment to this letter, along with a brief statement of the key events, the relevant dates, and a notation indicating whether or not the information was included in the SALP report.

Some of the recent organizational changes at Plant Hatch were mentioned but insufficient attention was paid to the effect of those changes. It is also significant to note that not all of the positions in the new organization were filled for the entire evaluation period. There have also been changes in the QA organization which have strengthened its role in plant activities.

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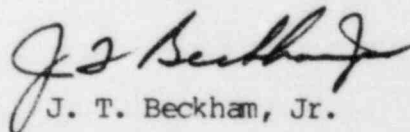
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In reviewing the SALP report for Plant Vogtle activity, it should be noted that the NRC's guidance for submittals allows for incorporation of material by reference. This fact justifies the frequent references to the Vogtle Final Safety Analysis Report used in the Vogtle Environmental Report. It should also be noted that the Vogtle Vice President, the Vogtle Plant Manager, and the Vogtle Site QA Supervisor were not included in the initial NRC distribution of the SALP report.

While we disagree with certain aspects of the methodology and some of the findings and implications of the SALP report, we appreciate this opportunity to attempt to correct the public perception. As stated in our letter of March 15, 1984, we do not see the need for a public meeting between our staffs on this subject. If you have further questions, please contact this office.

Very truly yours,


J. T. Beckham, Jr.

Attachment
MJB

xc: D. O. Foster
G. Bockhold
H. C. Nix, Jr.
Senior Resident Inspectors

Attachment to April 5, 1984 letter to Region II

WELD OVERLAY

<u>EVENT</u>	<u>DATE</u>	<u>SALP</u>
NRC found steps 19, 20 and 23 had been signed off without steps 17, 18, and 21 being signed off	1-19	Yes
GPC had not followed HNP-34	1-19	Yes
Personnel were counseled	2-16	No
All steps in procedure were completed	2-16	No
Procedure was technically correct all the time	All	No

MISPOSITIONED VALVES

<u>EVENT</u>	<u>DATE</u>	<u>SALP</u>
Violations for improper valve alignments	11-2-82	Yes
	2-18-83	Yes
	2-23-83	Yes
	5-5-83	Yes
Drafted administrative control system for locked valves: tracks all changes in locked valve position conducts audit of 1/3 of the valves monthly	9-30-83	No

ROD MANIPULATION

<u>EVENT</u>	<u>DATE</u>	<u>SALP</u>
Consensus decision for initial rod movements	7-14	Yes
Proper procedure compliance after rod out of sequence	7-14	No
Personnel removed from duty	7-14	No
Plant management conducted training session	7-14	No
Management investigation	7-14	No
Standing Orders issued	7-15	No
Shift Duty presentations	7-16	No
STA/Operator counseled	7-18	No
Briefing to all supervisors and above	7-27	No
Rod movement procedure revised	8-4	No
Simulator training in lessons learned	9-30	Yes
Special FSAR analysis training	9-30	No
STA role training	9-30	No
Philosophy of Operations in training	9-30	Yes

CABLE TRAY

<u>EVENT</u>	<u>DATE</u>	<u>SALP</u>
NRC Resident raised cable tray issue	2-15	Yes
QA/QC involvement began	2-25	No
Site management meeting for corrective action	3-2	No
Bechtel and Southern Services notified	3-3	No
Site work started to repair cable trays	3-4	No
Initial GPC inspector training completed	3-6	No
Initial evaluation of discrepancy	3-16	No
Quality Assessment Team formed	3-17	No
Additional Inspectors training completed	3-20	No
Cable tray restoration project organization formed	3-23	No
New administrative controls for all maintenance activities implemented: Foreman/contractors complete forms Foreman/contractors walkdown system	3-31	No
Special cable tray review task force	4-21	No
NRC reviewed program and acknowledged improvements	5-11	No
NRC violation and civil penalty	6-2	Yes
All accessible safety problems corrected	8-1	Yes
Drafted new Deficiency Report which helps in prompt evaluation	8-31	No
Lessons learned in training	9-1	No
Other maintenance and modifications programs reviewed	9-30	No
Quality Assessment Team findings	10-5	No