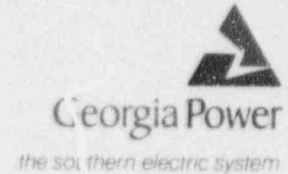


Georgia Power Company
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 877-7122

C. K. McCoy
Vice President, Nuclear
Vogtle Project

June 5, 1995



LCV-0621

Docket No. 50-424

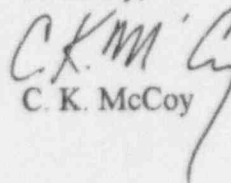
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Ladies and Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
LICENSEE EVENT REPORT
LACK OF PENETRATION SEALS REPRESENTS
CONDITION OUTSIDE OF DESIGN BASIS

In accordance with the requirements of 10 CFR 50.73, Georgia Power Company (GPC) submits the enclosed report associated with a condition which was discovered to exist on May 11, 1995.

Sincerely,



C. K. McCoy

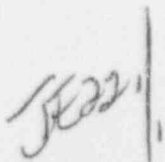
CKM/AFS

Enclosure: LER 1-95-01

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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PDR ADDCK 05000424
S PDR



EXPIRES: 5/31/95

LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Vogtle Electric Generating Plant - Unit 1										DOCKET NUMBER (2) 5000424				PAGE (3) 1 OF 4	
TITLE (4) LACK OF PENETRATION SEALS REPRESENTS CONDITION OUTSIDE OF DESIGN BASIS															
EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)						
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME VEGP - UNIT 2				DOCKET NUMBER(S) 05000425		
05	11	95	95	001	00	06	05	95	FACILITY NAME				05000		
OPERATING MODE (9) 1		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 2.201 (Check one or more of the following) (11)													
POWER LEVEL (10) 100		20.402(b)				20.405(c)				50.73(a)(2)(iv)				73.71(b)	
		20.405(a)(1)(i)				50.36(c)(1)				50.73(a)(2)(v)				73.71(c)	
		20.405(a)(1)(ii)				50.36(c)(2)				50.73(a)(2)(vi)					
		20.405(a)(1)(iii)				50.73(a)(2)(i)				50.73(a)(2)(vii)(A)				OTHER (Specify in Abstract below and in Text, NRC Form 366A)	
		20.405(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(vii)(B)					
		20.405(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(x)					
LICENSEE CONTACT FOR THIS LER (12)															
NAME Mehdi Sheibani, Nuclear Safety and Compliance										TELEPHONE NUMBER (include area code) AREA CODE 706 826-3209					
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)															
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS					
SUPPLEMENTAL REPORT EXPECTED (14)										EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR	
YES (If yes, complete EXPECTED SUBMISSION DATE) X NO															

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-space typewritten lines) (16)

On May 11, 1995, Vogtle Electric Generating Plant's (VEGP's) architect/engineer notified plant management that an engineering evaluation had been completed. The evaluation concluded that necessary penetration seals had not been specified at either the Unit 1 or Unit 2 interfaces between the diesel generator (DG) electrical tunnels and level B of the control buildings. The DG electrical tunnels are open to the outside atmosphere via HVAC vents which ventilate the tunnels. With the absence of the penetration seals, a design basis depressurization event, such as a tornado, could depressurize portions of the control buildings, which house components not qualified for this condition. At 1808 EDT, a determination was made that this was a condition outside of the design basis for the plant and the NRC Operations Center was notified.

The root cause of this event was a failure by the design architect/engineer to specify the design and installation requirements of these penetration seals during the initial design and construction of VEGP. The seals have since been installed. A broadness review and walkdown of other susceptible tunnels revealed no similar pressure seal problems, indicating that the event is an isolated occurrence.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Vogtle Electric Generating Plant - Unit 1	DOCKET NUMBER (2) 05000424	LER NUMBER (6)			PAGE (3)		
		YEAR 95	SEQUENTIAL YEAR - 001	REVISION NUMBER - 00			
					2	OF	4

TEXT (If more space is required, use additional copies of NRC Form 366A)(17)

A. REQUIREMENT FOR REPORT

This report is required per 10 CFR 50.73 (a)(2)(ii) because a condition was found which was outside of the design basis of the plant.

B. UNIT STATUS AT TIME OF EVENT

At the time of the discovery of this event, both Unit 1 and Unit 2 were operating in Mode 1 (power operations) at 100 percent of rated thermal power. Other than that described herein, there was no inoperable equipment which contributed to the occurrence of this event.

C. DESCRIPTION OF EVENT

On May 11, 1995, Vogtle Electric Generating Plant's (VEGP's) design architect/engineer (A/E) notified plant management that an engineering evaluation had been completed. The evaluation concluded that necessary penetration seals had not been specified at either the Unit 1 or Unit 2 interfaces between the diesel generator (DG) electrical tunnels and level B of the control buildings and that this may represent a condition outside the plant's design basis.

The evaluation was initiated in early 1994 when the lack of seals had been brought to the A/E's attention upon discovery during a walkdown for an unrelated design change. During this 1994 walkdown it was documented that these unsealed penetrations were located directly beside pressure boundary doors separating identical areas. It was not recognized as an immediate concern because previous engineering analysis had concluded that a fire barrier seal was not required at that location and this analysis was utilized as an indicator that a pressure seal was also not required. Contributing to this oversight was; 1) during the original construction verification walkdown process, underground structures were de-emphasized as needing to be scrutinized for missile protection or pressure boundary seal integrity, and 2) the widely held assumption that this particular pressure boundary issue had been addressed and documented during the original construction era, but the documentation was not readily retrievable. However, after an extensive search and review of design documentation, no justification for the absence of the penetration seals could be located.

At 1808 EDT, on May 11, 1995, a determination was made that this was, in fact, a condition outside of the design basis for the plant. At 1843 EDT, the shift superintendent notified the NRC Operations Center of this condition per 10 CFR 50.72 (b)(1)(ii)(B).

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FACILITY NAME (1)

DOCKET NUMBER (2)

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Vogtle Electric Generating Plant - Unit 1

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TEXT (If more space is required, use additional copies of NRC Form 366A)(17)

D. CAUSE OF EVENT

The root cause of this event was failure by the architect/engineer to specify the design and installation requirements of these penetration seals at the Unit 1 and Unit 2 interfaces between the DG electrical tunnels and level B of the control buildings during the initial design and construction of VEGP.

Contributing to the occurrence of this event were:

- 1) During the original construction verification walkdown process, underground structures were de-emphasized as needing to be scrutinized for missile protection or pressure boundary seal integrity.
- 2) There was a widely held assumption that this particular pressure boundary issue had been properly addressed and documented during the original construction era, but the documentation was not readily retrievable. However, after an extensive search and review of design documentation, no justification for the absence of the penetration seals could be located.

E. ANALYSIS OF EVENT

The DG electrical tunnels are open to the outside atmosphere via HVAC vents which ventilate the tunnels. In the absence of the subject penetration seals, a tornado passing over the electrical tunnels could depressurize a portion of the control building, potentially resulting in conditions that are outside the qualification envelope of components in those areas.

The design basis depressurization for the plant is 3 psi at a rate of 2 psi/second and a duration of approximately 40 seconds. VEGP environmental design criteria indicates that level B of the control building is to remain at atmospheric pressure during abnormal conditions, including a tornado. However, design drawings did not specify penetration seals at these specific underground locations. The affect of depressurization on most control building components due to a tornado is not analyzed, therefore the penetration seals have been installed. Other effects of a tornado, such as wind, rain and missiles are negligible due to the underground location of the interfaces.

An evaluation was conducted of the risk associated with continuing plant operation until installation of the seals was completed. The evaluation considered the fact that tornadoes with the capability of producing an excessive depressurization are rare, and that the probability of such a tornado passing over the associated vents during the time required for installation of the penetration seals was unlikely. Also, by taking appropriate compensatory action, the impact of such a tornado could be

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Vogtle Electric Generating Plant - Unit 1

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TEXT (If more space is required, use additional copies of NRC Form 366A)(17)

reduced to a condition that is bounded by the design envelope of the equipment in the control building. Based upon this evaluation, it was determined that the non-conforming condition did not pose an immediate threat to the public health and safety, nor impact equipment or plant operability. Therefore, it was determined that the plant could continue to operate safely during the time required for installation of the seals.

On May 12, 1995, a standing order was issued to open various doors in both Unit 1 and Unit 2 level B control buildings should a tornado warning or tornado watch be issued, until the penetrations could be properly sealed. Had a tornado passed over one unit's DG electrical tunnel HVAC vents, the open doors would allow outside air to enter from the other unit's DG electrical tunnel HVAC vents and prevent a substantial depressurization in the control buildings. The distance between the different units' tunnel vents preclude the possibility of depressurizing both locations simultaneously.

F. CORRECTIVE ACTION

- 1) Penetration seals were installed at the Unit 1 and Unit 2 interfaces between the DG electrical tunnels and level B of the control buildings.
- 2) The appropriate design documents will be updated by June 16, 1995, to indicate the installation of the newly installed penetration seals.
- 3) A broadness review and walkdown of other susceptible tunnels revealed no similar pressure seal problems.

G. ADDITIONAL INFORMATION

- 1) Failed Components:
None
- 2) Previous Similar Events:
None
- 3) Energy Industry Identification System Code:
Control Building Penetration Seals - NA