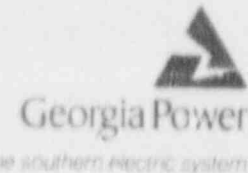


Georgia Power Company
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C. K. McCoy
Vice President, Nuclear
Vogtle Project



January 10, 1992

ELV-03357
3487

Docket No. 50-424

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
REPLY TO A NOTICE OF VIOLATION

Pursuant to 10 CFR 2.201, Georgia Power Company (GPC) submits the enclosed information in response to the violation identified in Inspection Reports 50-424, 425/91-31 which concern the inspection conducted by Mr. B. R. Bonser during the period of October 27 - November 23, 1991.

Should you have any questions, please contact this office.

Sincerely,

C.K. McCoy
C. K. McCoy

CKM/JAB/clr
Enclosure

xc: Georgia Power Company
Mr. W. B. Shipman
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 - UNITS 1 AND 2 REPLY TO A NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424/91-31 AND 50-425/91-31

"10 CFR 50, Appendix B, Criterion XIV; Inspection, Test, and Operating Status; requires in part that measures be established for indicating the operating status of structures, systems and components of the nuclear power plant.

Contrary to the above, licensee measures established for indicating the operating status of plant systems were inadequate in that, on November 5, 1991, due to the conflicting information contained on the Limiting Conditions for Operation Status Sheets, a review of this information failed to identify a clearance which had closed two valves, 1-1208-U4-482 and 1-1208-U4-169. This resulted in an inoperability of the boron injection flow path which was required to be functional at that time.

This is a severity level IV violation. (Supplement 1)"

RESPONSE TO VIOLATION

Admission or Denial of the Violation:

This violation occurred as stated in the above notice and was reported to the NRC as Licensee Event Report 50-424/91-10.

Reason for the Violation:

This violation resulted from a cognitive personnel error on the part of the unit shift supervisor (USS) and the reactor operator (RO) on duty when the boron injection flowpaths were verified on November 5, 1991. An adequate review of the limiting condition for operation (LCO) was not performed, which resulted in the violation.

A contributing factor was Procedure 14406-1, "Boron Injection Flow Path Verification - Shutdown," which is used to verify that a boron injection flowpath exists; however, it does not verify the position of all normally locked manual valves, which are controlled by other administrative means.

Corrective Steps That Have Been Taken and the Results Achieved:

On November 6, 1991 at 1125 EST, a quality assurance audit was underway and valves 1-1208-U4-482 and 1-1208-U4-169 were found to be shut. Since these valves are in the flowpath for which credit was taken, this represented a failure to ensure a boron flowpath was available. The USS was notified, and by 1545 EST a boron injection flowpath was restored.

ENCLOSURE (CONTINUED)

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORTS 50-424/91-31 AND 50-425/91-31

During the 12 hour and 52 minute period involved, a boration flowpath was available from the refueling water storage tank through the positive displacement pump to the reactor coolant system.

The USS and RO have been counseled regarding the importance of adequate review of information when completing Technical Specification surveillance requirements.

Corrective Steps That Will Be Taken to Avoid Further Violations:

Additional corrective action will be taken to revise the appropriate boron injection flowpath procedure. This revision is anticipated to be completed by January 15, 1992.

Date When Full Compliance Will Be Achieved:

Compliance was achieved on November 6, 1991 at 1545 EST when a boron injection flowpath was restored.