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C. K. McCoy  
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February 10, 1992

ELV-03421  
001141

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 submits the enclosed response to the violation identified in NRC Inspection Reports 50-424/91-32 and 50-425/91-32 concerning an inspection conducted by Mr. B. Bonser during the period of November 24 - December 21, 1991.

Should have any questions, please contact this office.

Sincerely,

*C.K. McCoy*  
C. K. McCoy

CKM/NJS/gmb

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 - UNIT 1 REPLY TO A NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424/91-32 AND 50-425/91-32

"10 CFR 50, Appendix B, Criterion XVI, Corrective Action, requires in part that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to these requirements, licensee corrective actions were ineffective in preventing the repetition of entry into a condition prohibited by Technical Specifications associated with the Hydrogen Monitor Supply Containment Isolation Valves. On November 25, 1991, with the Unit in Mode 1, Control Room operators opened the Train A, Hydrogen Monitor Supply Containment Isolation Valves for four minutes. Opening these valves had previously been identified as a condition that would result in an entry into Technical Specification 3.0.3. Previous corrective action had been taken to preclude this condition.

This is a Severity Level IV violation. (Supplement 1)"

#### RESPONSE TO THE VIOLATION

##### Admission or Denial of the Violation

A violation occurred as stated above and as reported in Licensee Event Report 50-424/1991-013.

##### Reason for the Violation

The reason for the violation was cognitive personnel error. The Unit 1 unit shift supervisor (USS), shift superintendent, and balance of plant operator failed to recognize that opening the subject valves would result in a Technical Specification (TS) 3.0.3 entry.

On November 26, 1991, at 0130 EST, the Unit 2 USS pointed out Standing Order C-91-07, which cautioned that opening both an inside and outside containment hydrogen monitor inlet isolation valve in the same path during Modes 1, 2, 3, and 4 would result in entry into TS 3.0.3.

The individuals involved in the event were thoroughly trained and administrative controls were in place in the form of a Standing Order, caution tags on the handswitches for the subject valves, and procedural precautions; however, these controls were overlooked, which contributed to this violation. This was evident because the other licensed operators on site pointed out Standing Order C-91-07, which should have prevented the opening of these valves. In addition to the Standing Order, the operator manipulating the valves observed the caution tags

ENCLOSURE (CONTINUED)

VOGTLE ELECTRIC GENERATING PLANT - UNIT 1  
REPLY TO A NOTICE OF VIOLATION  
NRC INSPECTION REPORTS 50-424/91-32 AND 50-425/91-32

that had been installed on the handswitches, but did not see a problem with opening the isolation valves since the action requirements of TS 3.6-1.1 were to be entered.

Corrective Steps Taken and Results Achieved

- o Upon reviewing the Standing Order, the Unit 1 USS and the shift superintendent recognized that the opening of the hydrogen monitor valves had resulted in a TS 3.0.3 entry. Appropriate log entries were made to document the occurrence.
- o The Unit 1 USS, the balance of plant operator, and the shift superintendent have been counseled concerning their failure to recognize a condition requiring entry into TS 3.0.3.
- o The precautions of Procedure 13130-1, "Post-Accident Hydrogen Control," were revised to specifically state that opening both an inside and an outside containment hydrogen monitor isolation valve at the same time during Modes 1, 2, 3, and 4 will result in a TS 3.0.3 entry.

Corrective Steps That Will Be Taken to Avoid Further Violations

- o A proposed change to TS 3.6.3 is being pursued with the NRC which would allow the containment hydrogen monitor solenoid-operated isolation valves to be opened on an intermittent basis under administrative control.
- o This event will be discussed during licensed operator requalification training.
- o A copy of this violation will be placed in the Operations Reading Book.

Date When Full Compliance Will Be Achieved

Compliance was achieved at approximately 2343 EST on November 25, 1991, when the containment isolation valves for the Train A hydrogen monitor were closed.