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May 18, 1984

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

File: X7BG10
Log: GN-362

Reference: 50-424/84-04, 50-425/84-04

Attention: Mr. R. C. Lewis

Gentlemen:

Further to our letter dated April 9, 1984 (File: X7BG10, Log: GN-341), concerning the violation discussed in your inspection report 50-424/84-04 and 50-425/84-04, Georgia Power Company wishes to submit the following additional information:

Violation 50-424/84-04-01, "Failure to Follow Procedure for Concrete Expansion Anchor Inspection" - Severity Level V.

Georgia Power Company denies the alleged violation.

Paragraph 6.b of the Inspection Report Details describes testing performed on concrete expansion anchors in three safety-related base plates. One anchor in each of two plates was found to require additional nut rotation (1 1/2 and 1/3 turns respectively) in order to achieve the specified minimum torque values. Based on these results, the NRC Inspector postulated that the required torque values had not been attained during original installation. Two failures to follow procedure were cited:

1. Portions of the concrete expansion anchors were not installed by the craftsmen in accordance with the specified procedures.
2. Quality Control inspectors failed to verify the required torque values for the two concrete expansion anchors as required by field procedure GD-T-27.

Georgia Power Company identified the conditions of the two concrete expansion anchors in question in Deviation Report CD-5438. The deviation report was forwarded to the Vogtle Project Architect/

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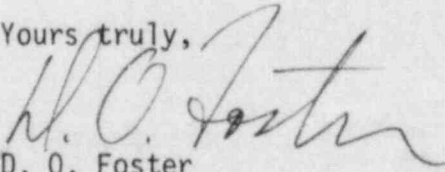
Engineer, Bechtel Power Corporation, for an engineering evaluation and disposition. The deviation report was voided by Bechtel in accordance with project procedures for the following reasons:

1. The reported deviation is not a violation of any construction specification, procedure, drawing, or design document.
2. The additional rotation of the anchor nuts required to achieve torque test value is a result of the loss of anchor preload. Loss of preload torque in concrete expansion anchors is an industry-recognized occurrence and studies have shown that it does not adversely affect the load capacity of the anchor.
3. Bechtel design guide C-2-40 for concrete expansion anchors provides for anchor relaxation.
4. The original inspection reports for the two anchors in question document that procedural acceptance criteria were met at the time of installation.

Georgia Power Company Engineering concurs with Bechtel's evaluation. The testing witnessed by the NRC Inspector was conducted one month and two months respectively after installation and inspection of the two anchors. Georgia Power Company maintains that the results of tests performed one month after installation, considering the effects of anchor relaxation, is not valid justification to question the initial installation and inspection.

This response contains no proprietary information and may be placed in the NRC Public Document Room.

Yours truly,


D. O. Foster

REF/DOF/tdm

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ATTN: Victor J. Stello, Jr., Director
Office of Inspection and Enforcement
Washington, D. C. 20555

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