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Docket Nos. 50-424
50-425

ELV-02853

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

VOGTLE ELECTRIC GENERATING PLANT
BIENNIAL REVIEWS OF NUCLEAR PLANT PROCEDURES

Gentlemen:

Georgia Power Company hereby requests a change to the Quality Assurance Program as described in the Vogtle Electric Generating Plant Units 1 and 2 Final Safety Analysis Report (FSAR), sections 1.9.33, 13.5.1.1 and 17.2.1.3.3. Currently, the FSAR requires that plant procedures be reviewed at least every 2 years. This procedure review process is controlled by internal plant procedures. The FSAR also currently references the conformance to Regulatory Guide 1.33, which endorses ANSI N18.7-1976. This ANSI standard requires the biennial review of plant procedures.

Based on the justifications in Attachment 1, Georgia Power Company proposes to change the FSAR to provide for biennial Quality Assurance audits of the plant procedural development and maintenance program utilizing a representative sampling process. This biennial audit would replace the current commitment of performing a biennial review of all procedures except the commitment to review the Emergency Plan Implementation Procedures on a biennial basis or commitments associated with the review of security procedures. Existing plant programs, independent of the biennial review program, provide for adequate review and revision, if necessary, of plant procedures to ensure they remain technically correct and adequate. Also, Georgia Power Company proposes to include a statement in the FSAR for the Safety Audit and Engineering Review staff to perform a biennial quality assurance audit of the plant procedural development and maintenance programs utilizing a representative sampling process. Although this would be a new FSAR provision, Georgia Power Company already performs the scope of this audit as part of the current quality assurance program. Attachment 2 provides the proposed FSAR wording revisions.

Pursuant to the requirements of 10 CFR 50.54 (a), Georgia Power Company has concluded that there would be no significant reduction in commitments in the Quality Assurance Program as a result of this change. However, as

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a conservative measure, Georgia Power Company is requesting NRC approval before implementing this change. Following NRC approval, Georgia Power Company will update its internal procedures and the FSAR and transmit those changes to the NRC on schedules consistent with the regulations.

The Plant Review Board has reviewed and recommended approval of this proposed change and the Safety Review Board will review this proposed change at a future meeting. Georgia Power Company requests that this proposed change be approved by the NRC by July 1992.

In accordance with 10 CFR 50.91, the designated state official will be sent a copy of this letter and all enclosures.

Respectfully submitted,

GEORGIA POWER COMPANY

C. K. McCoy
C. K. McCoy

CKM/JMG
Attachments

Sworn to and subscribed before me this 3rd day of April, 1992.

Mary N. Bentley
Notary Public

My Commission Expires: _____ MY COMMISSION EXPIRES MAY 6, 1993

cc: Georgia Power Company

Mr. W. B. Shipman, General Manager - Plant Vogtle
NORMS

U. S. Nuclear Regulatory Commission, Washington, DC
Mr. D. S. Hood, Licensing Project Manager - Vogtle

U. S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebner, Regional Administrator
Mr. B. R. Bonser, Senior Resident Inspector - Vogtle

State of Georgia
Mr. J. D. Tanner, Commissioner, Department of Natural Resources

Attachment 1
Justification for Change to Biennial Audits of Procedures

Introduction

Currently, FSAR section 13.5.1.1 requires that plant procedures be reviewed at least every 2 years. These reviews were developed during plant licensing to address the procedure review philosophy of ANSI N18.7-1976 endorsed by Regulatory Guide 1.33.

Georgia Power Company has 4,200 procedures which fall under the 2-year review requirements. A conservative estimate for the biennial review time for these procedures is 20,000 manhours. Also, the documents supporting the review of each procedure are considered life-of-plant documents; therefore, more space must be allocated each year for storage.

By letter dated December 21, 1990, from Georgia Power Company to J. P. Stohr of the NRC, the commitment was made to provide for a biennial review of the Emergency Plan Implementation Procedures rather than an annual review. This commitment will remain. Commitments relative to security procedures also remain unchanged.

Discussion

ANSI N18.7-1976 provides for a static biennial review process, but recognizes that the procedure review process may change as a plant reaches operational maturity. Georgia Power Company believes that an ongoing dynamic process is inherently required in maintaining procedures in an accurate and useful condition. This process requires that procedural controls be in place to provide for procedure changes as the plant design, regulatory, or operational requirements change.

In addition, most of these procedures are used frequently by plant personnel. As plant personnel use these procedures, problems are identified and resolved through various internal programs, some of which are discussed below. Further, a significant portion of the emergency operating procedures are frequently used through various simulator training programs. Once identified, procedural issues are addressed in an expeditious manner.

Georgia Power Company continually evaluates its procedure maintenance processes and has effected controls to ensure that potential procedural impact is assessed and revisions are made based on input from a number of different programs. The following programs adequately provide input to procedure revisions and changes:

(1) Plant Design Control Program

The plant design control program requires an interface review of all modifications by groups which are potentially affected by the modification. This interface review requires that all procedures potentially affected by the modification be identified, and changes and revisions be ready to be implemented upon completion of the modification. All group managers must indicate that all revisions to plant procedures have been issued before the modification package can be considered complete.

(2) Operating Experience Program

The operating experience program requires the review of NRC bulletins, notices, and generic letters; Westinghouse Owner's Group information; INPO significant operating event reports (SOERs), significant event reports (SERs), and operation and maintenance reminders (O&MRs); Nuclear Network operating plant experience reports; controlled vendor technical information; unsolicited vendor technical information; and various internally generated reports such as the incident report. This review includes an evaluation of applicable procedures and the initiation of any required procedure changes.

(3) Licensed Operator Requalification Program

As potential deficiencies are identified in the emergency operating procedures, formal processes are in place to identify and resolve them. This includes procedure revisions, if appropriate.

(4) Deficiency Control Program

The deficiency control program is in place so that any individual onsite who identifies a potential deficiency may report it directly to the Unit Shift Supervisor. As potential deficiencies are identified, formal processes are in place to resolve them. This includes procedure revisions, if appropriate.

(5) Technical Specifications and FSAR Revisions

Revisions to Technical Specifications and the FSAR require evaluation for impact on procedures and result in the initiation of procedure changes, if appropriate.

(6) Quality Assurance Program

The Quality Assurance Program includes a review of procedures as part of the audit and surveillance process (which is based on a 2-year cycle). The Quality Assurance Program assigns the responsibility to the Safety Audit and Engineering Review (SAER) group to audit the entire procedural process on a periodic basis. The Plant Review Board (PRB) also performs overviews that include a review of many plant procedures. Input into the procedure revision process may be provided by either of these two avenues.

(7) Surveillance Test Program

The surveillance test program provides direction to evaluate the need for a procedure change that is identified through the performance of a procedure. These changes may be required prior to continuation of the performance of the tests, or after completion of the tests, depending on the nature of the discrepancies.

(8) Vendor Documents Review Program

The vendor documents review program requires the review of vendor manuals and revisions to vendor manuals. This review includes an evaluation of applicable procedures and the initiation of any required procedure changes.

(9) Plant Personnel Feedback

Plant personnel including operators are trained and directed by procedure to report to management any procedural deficiencies or concerns which may prevent or impact their implementation. Feedback into the procedure revision process may be initiated through such programs as the operating experience program.

(10) Simulator Training Program

As potential deficiencies and enhancements are identified in the emergency operating procedures during simulator and classroom training, formal processes are in place to identify and resolve them. This includes procedure revisions, if appropriate.

Conclusion

As evidenced by the number of programmatic controls discussed above for procedure input and revision, Georgia Power Company considers the biennial

review process to be an unnecessary regulatory requirement. The impact on plant resources for the biennial review process reduces the site personnel's ability to concentrate on issues of greater significance to plant safety. Therefore, Georgia Power Company proposes to change the FSAR to provide for biennial Quality Assurance audits of the plant procedural development and maintenance program utilizing a representative sampling process. This biennial audit would replace the current commitment of a biennial review of all plant procedures, except the commitment to review the Emergency Plan Implementation Procedures on a biennial basis or commitments associated with the review of security procedures, and will provide verification that the existing plant programs and activities are effective in maintaining procedures current.

ATTACHMENT 2
PROPOSED FSAR MARKUPS

VEGP-FSAR-1

3. Paragraph C.5.g of Regulatory Guide 1.33 will be implemented with the addition of the modifier "normally" after each of the verbs (should) which the Regulatory Guide converts to "shall." It is GPC intent to fully comply with the requirements of this paragraph, and any conditions which do not fully comply will be documented and approved by management personnel. In these cases, the reason for the exception shall be retained for the same period of time as the affected preoperational tests.

4. Insert 1

1.9.34 REGULATORY GUIDE 1.34, DECEMBER 1972, CONTROL OF ELECTROSLAG WELD PROPERTIES

1.9.34.1 Regulatory Guide 1.34 Position

This guide describes an acceptable method of implementing requirements with regard to the control of weld properties when fabricating electroslog welds for nuclear components made of ferritic or austenitic materials.

1.9.34.2 VEGP Position

Conform. Refer to paragraph 5.2.3.4.6.

1.9.35 REGULATORY GUIDE 1.35, REVISION 2, JANUARY 1976, INSERVICE INSPECTION OF UNGROUTED TENDONS IN PRESTRESSED CONCRETE CONTAINMENT STRUCTURES

1.9.35.1 Regulatory Guide 1.35 Position

This guide describes an acceptable basis for developing an appropriate inservice inspection and surveillance program for ungrouted tendons in prestressed concrete containment structures.

1.9.35.2 VEGP Position

Conform as discussed in subsection 3.8.1.

INSERT 1 During original plant licensing, a 2 year review process for plant procedures was developed to meet the requirement of Regulatory Guide 1.33 and ANSI 18.7-1976. Since the procedural process has now matured and adequate programs to assure procedural revisions consistent with plant design, operational, and regulatory requirements are in place, this original commitment has been modified to require biennial Quality Assurance audits of the procedural development and maintenance program utilizing a representative sampling process. Therefore, the 2 year review process is no longer required.

VEGP-FSAR-13

Operations department heads shall further ensure that procedures described in subsection 13.4.1 are forwarded to the Plant Review Board (PRB) for additional review.

For procedures not forwarded to the PRB, reviewers will meet requirements of section 4.4 of ANSI N18.1-1971 for applicable disciplines. For those disciplines not described in section 4.4 of ANSI 18.1-1971, the reviewer will have a minimum of 5 years experience. A maximum of 4 years of this 5 years may be fulfilled by related technical or academic training. Reviewers of quality control inspection procedures shall meet the requirements of Regulatory Guide 1.58. Also, those procedures not forwarded to the PRB and impacting another department's area of responsibility, shall be forwarded to the impacted departments for their review.

The general manager-nuclear plant (Vogtle) (GMNP) has ultimate responsibility for all plant procedures. Provisions of these procedures establish the GMNP as the approving authority for procedures which establish plant-wide administrative controls (which implement the quality assurance program and the Technical Specifications surveillance program); unit operating procedures (UOPs); emergency operating procedures (EOPs); abnormal operating procedures (AOPs); procedures for implementing the security plan, the emergency plan, and the fire protection program; and fuel handling procedures. Nuclear Operations department heads are established as the approving authority for other procedures covering activities within their area of responsibility.

Additional provisions of these procedures exist to ensure that changes or revisions to procedures are reviewed and approved in accordance with the same administrative controls used for review and approval of new procedures. ~~A provision is made to ensure that plant procedures except firefighting preplan are reviewed at least every 2 years by a knowledgeable individual to determine whether changes are necessary or desirable. Also, provisions exist to ensure that procedures, once approved, are distributed appropriately so that only the most current procedures are used by plant personnel.~~

→ As part of the overall quality assurance program, the SAER group performs various audits (described in 17.2) to assure that the procedural process is working and that procedures are being properly maintained.

E. To assure that controls are in place to effectively maintain plant procedures, the SAER staff will perform a biennial audit of the procedural development and maintenance program utilizing a representative sampling process.

VEGP-FSAR-17

17.2.1.3.3 SNC Safety Audit and Engineering Review (Onsite)

The SNC SAER staff will selectively audit those quality-related activities that are within the scope of the OQAP, as described in subsection 17.2.2, to verify compliance with the requirements of the OQAP. These consist of activities performed onsite and those performed offsite in support of VEGP when directed. The results of all such audits will be reported to the organization audited and the vice president-nuclear (Vogtle).

SAER personnel have written authority to stop work on a system, structure, or component that affects nuclear safety if the work is not in accordance with provisions of the OQAP. Disputes arising from differences of opinion between SAER personnel and other department personnel will be resolved by the lowest level of management possible. If necessary, the vice president-nuclear (Vogtle) will make the final disposition. The MSAER shall regularly assess the SAER workload to ensure a sufficient number of personnel are available for complete and efficient implementation of their quality assurance responsibilities. Specific duties and responsibilities of the SAER onsite group (headed by the supervisor-safety audit and engineering review) are as follows:

- A. Prepares annual schedule and performs planned audits of organizations and activities (GPC and contractors).
- B. Provides the MSAER with information on site activities on a routine basis.
- C. Maintains open-items list of SAER onsite group audit results; follows up until resolved and closed out.
- D. SAER participates in the development process for plant procedures by evaluating procedure adequacy and implementation in the SAER audit program and through its non-voting membership in the Plant Review Board.

SAER personnel have access to meetings where quality matters are discussed. The MSAER shall designate the types of meetings his staff or representative(s) from his staff will routinely attend, including day-to-day work planning meetings and staff meetings.

17.2.1.4 Engineering

The SNC Nuclear Support (Vogtle) has overall responsibility for assuring the availability of and providing or securing adequate engineering and technical support for the VEGP. The SNC manager-nuclear engineering and licensing (Vogtle) serves as the