

I-MOSBA-256

NUCLEAR REGULATORY COMMISSION

Docket No. 50-424/425-OLA ?

EXHIBIT NO. II-256

In the matter of Georgia Power Co. et al., Vogtle Units 1 & 2

☐ Staff ☐ Applicant ☒ Intervenor ☐ Other

☐ Identified ☒ Received ☐ Rejected Reporter ED

Date 9/15/95 Witness BOCKHOLD

'95 OCT 20 P4:41

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

AFTER - SCREENING
INVESTIGATION
MCC REVIEW
VP REVIEW
MGMT. COUNCIL

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X3143

Ref: Alan Mosbaugh

6/19/90

Chuck Whitney called and advised that Alan Mosbaugh (Plant Vantage) had filed a Department of Labor complaint and had secured the legal services of the same firm out of Washington handling the Hobby case (lawyers name - ~~John A. Love~~ JBS)

Whitney had discussed the situation with Ken McCoy and they had agreed to have Corporate Concursos work with the plant in identifying and resolving any and all ^{technical} issues identified by Mosbaugh.

JBS

Re: Alan Moskovich concern

6/21/90

Conversation with George Bockhold; Bill Lyon

George recapped some info from 6/20 ^{telephone conversation} meeting. Said the PLS was upgraded as the plant was fully operational by making the line managers the PLS. Skip Kitchene (Asst S/O Operations) was Chairman and Alan (on behalf of Tom Greene) was Asst. Vice Chairman.

George said Alan was on list for "Managers in Training" until he (Alan) expressed his intent to retire. Said Chris Eckert, Steve Chestnut and Melvin Driffie were now in S/O school as part of planned rotation.

George gave the following info on technical issues:

- CER - The error had been on the number of successful starts. Problem was with the form used. Alan questioned why they had sent on the information for a month. Had told the NRC "acting" resident of the situation a week before Alan raised it.
- 1A & B diesel failures, ^{incident} was documented in IIT report
- Diesel air quality. Plant had lacked understanding of requirements. Mike Horton, Ken Stokes, Ken Burr and Paul Caderni had discussed. Felt that Alan had agreed with others that air quality was OK.

° There were 2 or 3 votes of the PRB where there were dissenting votes. Carolyn had PRB minutes.

° George said Alan had questioned availability of the DCP package. Advised full access not allowed in past due to confidentiality of interviews.

At this point George asked for Alan to join us.

George advised of my purpose - to perform an independent investigation of all of Alan's technical concerns. George advised Alan that Alan's top priority should be to identify any/all concerns he had which had not previously been listed.

He further advised that general access to the DCP files would not be allowed but that Alan could have copies of any information he provided. I advised Alan of my intent to let the NRC know of my involvement and to ascertain what, if any, role they wished to play.

AKD

Re: Alan Woolbrough concern
a/p/90

Conversation with John Rogge (USFRLC)

Bill Lyon and I met with John Rogge and advised I had been assigned to address all technical concerns raised by Alan Woolbrough.

John indicated he had participated in the meeting with Serge and Alan only at Serge's request; with Region agreement.

John said there was no desire to participate in an internal investigation by GPC.

ASA

Ref: Allen Mostaugh concern

6/21/90

Interview of Allen Mostaugh X 3143

Allen began the conversation by stating that he was acting under the advice of his legal counsel to not discuss or answer questions with regard to retaliation. I advised that the scope of my review was currently limited to just technical issues.

We discussed that I was aware of several issues which he was considered involved with identifying and that I was aware he had made a statement to the effect that there were or may be several other issues with which he was concerned. He agreed there were and that most were in the normal process of doing business and had not reached a final, unacceptable conclusion. As such, they were not issues he felt needed to be identified for "special treatment". He indicated that one source for his additional issues would be PRB minutes. Things to look for would be non-unanimous actions of the PRB, actions "tabled" for ~~adm~~ reasons other than administrative/time constraints and meetings which were attended by George Eckhold as he normally only attended if there was a key issue to be discussed. I advised we would review PRB minutes for such items and provide a list for his use (Bill Lyon was subsequently given this task). I indicated I would return to the plant the following week to get the remaining issues. Allen

said his daughter had a medical problem and would be going into the hospital Tuesday but that he should be back and ready by Wednesday if everything went as planned.

The following was offered with regard to issues already identified:

- ① FAVA system - Allen indicated he went to Quality Concerns with this after he had exhausted all available "normal" means and still felt a blatant problem existed.

The inadequacies in the system had initially been identified by QA and the system taken out of service. When brought up to PRB to place back in service, Allen protested that Reg. Guide 1.143, ASME Codes, standards and the overall QA program had all been violated and then voted in opposition to the rest of the Board.

The General Manager became personally involved and, after the first couple of meetings, ran the meetings. A vote was ultimately taken and the system placed back in service.

Allen then brought additional information and it was again taken out of service. Others on the PRB also began to show concern. They all wrote their concerns down. A response was provided to the concerns.

A second vote was taken when Allen could not attend (his wife was kicked out of the house with a child running a fever). John Auflenkamp expressed concern (recorded in the meeting minutes) about taking the vote with Allen absent. The vote was taken; the system was placed back in service.

Allen noted that during the Quality Concern investigation interviews, one member expressed to Bill Ayon that he felt intimidated.

Questions this raises in Allen's mind are:

- Why doesn't the PRB act conservatively?
- Why does the G.M. run the PRB?
- Why was a vote taken while the "jury was still out"?
- Why vote when Allen was out?

Overall, the concern here is of non-conservative decision making in violation of commitments.

Allen referred to an NRC concern expressed to Sr. Management. It was reported that Pat McDonald, Hairston and McCoy were called to

Washington to respond to concerns that Vogtle's management - Vogtle's attitude - was "cavalier, cowboy" and that they "don't openly disclose information". Following this meeting management directed that they institute more conservative decision making.

Allen perceives the "root cause" to be a matter of the plant following by example - that when it is seen that "latitudes" are taken at higher levels, they spread down. Feels this is the current plant culture.

A segment at the plant sees this as non-conservative and objects - this leads to intimidation such as expressed after the last FAVA vote.

③ Diesel air quality. Issue was raised during the IIT investigation. The issue was brought to Allen's attention by one of his engineers - Allen had asked Jim Steele to look into it after hearing reports that the ~~plant~~^{diesel} had a history of high dew points.

In early April Allen wrote a memo to George Sockhold outlining his concerns. A meeting was called the next day with several engineers (Mike Horton, Jim Steele, Kenny Stokes, Paul Berwinkle) The issue was discussed and dismissed after

only a cursory review. The issue is one of whether there may be corrosion products in the lines (which have some small orifices) due to the lines being wet internally over the years. (The IIT review followed the loss of power incident where the diesels failed to start).

Two areas are of concern:

- ① Are we sure, due to historical operation, that we don't have a particulate problem?
- ② We have not operated in compliance with submittals made to the NRC describing air quality. (i.e. we told the NRC we operated with dew points less than 55°F and know we have measured values greater than 55°F)

Allen stated that for years we operated without even measuring dew point. The submittal to the NRC was in response to a generic letter (~1 year ago) on diesel air quality. Allen feels reassembling all related memos should identify the picture.

- ③ "Cal-con" switches were written up in the IIT report. A "Part 2" had been issued by the

manufacturer and had not been acted on. Allen believes we still may not have made an appropriate response on reportabilities - that we may still be found to be in violation. An LER is involved.

IIT did a better job of reviewing this than the plant did, but we are still operating with equipment that has Part 21's on them.

Allen questions if we have written DC cards on all the things that were identified as being wrong during the review?

- ④ An LER was submitted on the diesel generator. In it, a number was included on successful starts which was later determined to be inaccurate. The problem related to the operations logs - they were not easily understood and they did not document all of the starts. Starts were made and not logged - there was a lack of knowledge on procedural requirements.

Allen questions why we haven't issued a revised LER. Feels management response to the issue was slow, unresponsive and ultimately inaccurate.

Allen provided George Sockhold a memo in April with this information.

⑤ Allen questions any situation where the PRB wasn't unanimous in ruling on reportability on DC cards. A specific example involved a missed ~~surveillance~~^{surveillance} on a Steam Generator Blowdown Valve. The PRB voted not to report and the NRC eventually issued a violation for not reporting it.

Also noted was that the Safety Review Board reviews PRB minutes. Believes it likely SRB had also reviewed the minutes of the meeting dealing with the blowdown valve prior to the NRC violation.

The NRC had issued supplemental guidance on how to handle missed or inadequately performed surveillances - this was discussed in the PRB meeting and caused one group to believe it was reportable.

Generally Allen believes that excessive GM intervention and participation negates the intended purpose of the PRB to bring multi-disciplined expertise to bear on issues.

Allen was vice-chairman of the PRB when it was reformulated to line managers. Tom Greene

went to school in February '89 and Allen took his responsibilities. The chairman of the PRB was the Asst. General Manager - Operations; Maintenance.

Allen left the PRB in early May.

Allen indicated George Bockhold had initially attended only when a major issue was being discussed.

Allen believes that when PRB action was ~~unless~~ ultimately found to be incorrect, that inadequate corrective action was taken to assure the mistake would not be repeated.

Allen also thinks a surveillance problem on pressure operated relief valves (PORV) which got a violation may also have gone to the PRB.

Allen feels the PRB is polarized between Operation/Maintenance (3) and Support (3) with the chairman (O/M) casting the deciding vote. Allen pointed out that when he assumed the role of Chairman (when Asst GM-O/M was out) there were no dissenting votes - that issues were resolved to everyone's satisfaction before a vote.

⑥ Allen questioned the Auxiliary Radiative Building design. This included its ability to contain a spray from a hose break and also the problem with the door being left open. Also, that the original study done on the PRB

is questionable in that Paul Kuesten and
Mark Ajluni are not experienced with radwaste.
Also believes they cater to Bockhold's desires due
to his having assisted in getting them the jobs
they have.

MSA

Ref: Allen Moslaugh concern
Meeting with Allen Moslaugh

4/22/90

Allen began the meeting by seeking clarification of some administrative issues. First he wanted to know if the information I developed would go into the Quality Concern file. I advised that FOIA related information would go into that file. Other files would be opened as needed. He then asked if the files would be open to Troutman Sanders lawyers. I advised "yes" as per normal OCP/CP practice. He then asked if "confidentiality" was available on any new concerns he might identify. I advised that it would be but he may also want to talk with Bill Lyon as well to assure a full understanding of the logistics of what could be done.

Allen then raised some additional information on the FOIA issue. The SCS engineer (Swinn) told the PkB over an open phone line that he would never have approved the use of PVC on the system if he had known temperatures could reach 110°F. Allen also expressed his belief it was negligent for the engineer to have approved this system without ever seeing it in person. Allen said other situations where this was done had detail design drawings/specifications etc which were not available for FOIA.

Allen then expressed what he saw as a

significant QA issue — why does management believe "all is well" when the entire QA program had been ignored. Allen's understanding was that deviation from QA programs (acting like one doesn't even exist) was not allowed without prior NRC approval. In this instance, SC seems to be saying — It's OK to waive the program because we've done a safety evaluation. What is the regulatory precedent for this? Allen sees this as a total programmatic exemption — not as a singular breakdown. Believes George Frederick shares this concern. SCS — Mark Agluni attempted to respond to this in a letter in the DC file but the response was judged as inadequate by Allen.

ABJ

The following notes Bookhold's meeting with Allen Moskough, Lee Glenn and Bill Lyon. In this meeting Allen was told that his concerns were being investigated by Lee and for him (Allen) to devote his time to working with Lee. He was also told that the concern file was considered confidential-client protected material; not all of its contents would be available to him, only that which he (Allen) gave could be seen.

W. C. Lyon
6/21/80

Re: Allen Moslaugh concern
Telephone call from George Borkhold

7/5/90

George called and asked if I would/could prepare a list of the issues I would be looking at in my investigation of the subject concern. He indicated that Ken McCoy, Jay Schandies and he would like to get a copy. I agreed to forward such a list.

George also indicated he had discussed Allen's expressed desire (to take any remaining concerns directly to the NRC) with the NRC residents. As of this time, George did not believe Allen had proceeded.

I advised I intended to bring Chuck Whitney up to speed on where we were. George concurred.

ASB

Re: Allen Moabangh concern
Telephone conversation with Ken McCoy

7/5/90

Called Ken McCoy and brought him up to speed on the status of identifying issues as well as my conversations with Chuck Whitney and Jay Schandria.

Ken felt that George Bockhold had things relatively under control and was not in favor of taking Allen to the Region. He felt the resident inspectors at the site had been brought in and would be the appropriate interface point to receive Allen's concerns.

I advised that I would fax a sheet of issues to him on Friday.

MSA

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DATE: 7/6/90

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THE SENDER IS: LEE GLENN

SENDER'S FAC NO. 8-526-~~801~~ 6817

LOCATION OF SENDER: 20/333 ATLANTA

TELEPHONE NUMBER OF SENDER: 8-526-1465

COMMENTS: CONFIDENTIAL

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July 6, 1990

PLANT VOGTLE
TECHNICAL/MANAGERIAL/REGULATORY CONCERNS

I. FAVA MICROFILTRATION UNIT

- A. System was purchased, installed and placed into operation in a process which bypassed all applicable commitments/requirements.
- B. System is located in a building which has had an inadequate safety analysis with regard to containing a potential spill.
- C. Combination of 'A' and 'B' above results in an installation with inferior (regulatorially excluded) materials (i.e. PVC) in operation in a building with questionable capacity for containing spills. Of particular concern is a line rupture which could spray against building walls.
- D. Plant management, the PRB and General Manager in particular, have responded in a non-conservative manner by allowing the continued operation of the system. Specific issues involve a PRB vote when the main dissenting member could not attend, excessive GM participation in PRB actions leading to intimidation of members, unreviewed safety questions being identified and not being adequately addressed prior to votes to operate.

II. DIESEL AIR QUALITY

- A. Due to operation with unknown and potentially high dew points, it is unknown as to whether the diesel generator air systems have experienced condensation and, as a result, therefore have corrosion products (particulate) in the lines which may jeopardize reliable operation.
- B. In response to a generic NRC letter dealing with diesel air quality, the plant submitted a response which included a statement that we operated with a dew point of 50 degrees F or less even though we have measured values in excess of this number. This took place about one year ago.

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VOGTLE ISSUES
Page 2

III. CAL-CON SWITCHES

- A. The manufacturer issued a 'Part 21' on these switches and the plant failed to take timely action.
- B. Plant may still not have made an appropriate response on reportabilities. An LER is involved.

IV. DIESEL GENERATOR LER

- A. The number of successful starts for the diesel generators included in an LER was not correct. Plant and corporate management took too long to correct this problem.
- B. Logs of these starts are not easily understood and there is a lack of knowledge on procedural requirements in this area.

V. PRB/MANAGEMENT - GENERAL

- A. The PRB does not act in a consistently conservative manner in areas of safety and reportability. Examples given were two issues on missed surveillances where the PRB found them to not be reportable and the NRC ultimately issued violations. Resolution of dissenting votes by PRB members is not pursued as far as it should be in certain instances.
- B. When individuals and/or the PRB errs in judgement, the corrective action taken to preclude further occurrences is not clear or decisive.

CONFIDENTIAL

I asked the current policy/procedure for handling non-unanimous PRB votes. George said the PRB had been directed to obtain resolution whenever possible. If not, the basis for dissention would be clearly written. I asked about PRB/GM disagreement. George indicated the ultimate decision was his but that when this arose he was to immediately notify the Vice President and the SRB.

I asked if George recalled the timing between his telling the IIT that the diesel air dew point readings were "OK" and then when he told them there was some problems with the readings. He recalled the incident but not the precise timing.

I asked what he knew about the purchase of a truck (and possibly a computer) along with the FAVA system. George said he understood everything to have been handled through procurement and felt it should all be "OK" but that he had not followed up on those issues.

I asked if he had Allen Mosbaugh's written memo on the diesel starts from back in April. George said he had returned it to Allen at the time with directions to follow up. He did not recall the timing on learning of the incorrect number in the CR and verbal notification of the problem to the PRB.

George and I concluded the interview by

going through the summary of issues which had been addressed to me. George reinforced information already provided in a couple of instances and also noted (with some frustration) that some of the issues being addressed were directly Allen Mosbaugh's responsibility when they were originally identified.

GBH

Re Allen Hirschman's concern

7/13/90

Interview with George Sockhold

I asked George what system was in place to take corrective action when the PRB's judgement was found to be in error. George indicated that he would receive all PRB recommendations initially and, if he disagreed, could resolve immediately. In cases where the NRC has issued violations in taking exception to the PRB position, the PRB has to review all responses to violations (as well as individually being responsible for preparation) which brings to their attention any misjudgements and a thorough analysis.

I asked what individual action might be taken in a situation where there were significant judgement errors. George indicated disciplinary action could certainly be considered. I asked if any such action had been taken with any individual involved in the initial installation of the FAVA system. George said there had not been any such action, that this did not constitute an issue of a degree great enough that the A-R and response were not enough to adequately address the misjudgements involved.

I asked George if he perceived any problems with the level of candor of any of the plant's management. George felt very comfortable in this area and expressed it was better than any other facility he had been involved with.