

Georgia Power Company  
Route 2, Box 299A  
Waynesboro Georgia 30830  
Telephone 404 554-9961 Ext 3360  
404 724-8114 Ext 3360



Georgia Power

THE GEORGIA POWER SYSTEM

D. O. Foster  
Vice President and Project  
General Manager  
Vogtle Project

August 24, 1984

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

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Reference: 50-424/84-14, 50-425/84-14

Attention: Mr. R. C. Lewis

The Georgia Power Company wishes to submit the following information concerning the violations discussed in your inspection report 50-424/84-14 and 50-425/84-14:

Violation 50-424, 425/84-14-01, "Three Audits Not Documented, Issued or Followed Up in Accordance with ANSI N45.2.12" - Severity Level IV.

- (1) Georgia Power Company acknowledges that reports were not issued for three QA audits, which were conducted in 1981 and early 1982, as identified in the Notice of Violation. In addition, the QA Department's review of this situation has identified one additional audit, CD04-81/13, which was never reported. This audit was conducted in February, 1981, to investigate the applicability of information gathered in a vendor audit for another plant to the Vogtle Project. The audit determined that the information was not applicable to Vogtle and was therefore cancelled and no report was issued. A total of 509 audits have been conducted by the Site Quality Assurance organization at the Vogtle Electric Generating Plant from the start of construction in 1977 to the present. Only four of these, all of which are identified in the NRC Notice of Violation and this response, were not reported as required by ANSI N45.2.12.
- (2) Georgia Power Company Quality Assurance Department Procedure QA-05-01, Revision 4, required that program elements be reviewed to the depth necessary to determine whether they were being used effectively. The drafts for the three audits identified in the violation as presented by the auditors to the QA Site Supervisor for review were found to be inconclusive, subjective, or in some cases incorrect by the QA Site Supervisor. Issuance of the reports as conducted and written would have been contrary to procedure QA-05-01. It was the QA Site Supervisor's prerogative and decision not to issue the audit reports. However, the reasons for these decisions were not documented. The basic cause of ~~weakness~~ in the conduct and control of the subject audits included inadequate direction in QA practices and procedures for audit planning, audit conduct and internal QA audit review and follow-up.

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- (3) The draft reports for audits CD01-81/75, CD06-81/80, and SP01-82/124 have been reviewed for content and each concern raised in the draft reports is being re-evaluated at this time. Results of the reviews and evaluations will be formally documented. Each concern identified in the draft audits will be addressed, resolved and, if necessary, documented regardless of the validity of the original concern or its significance.
- (4) In late 1982, the General Manager of Quality Assurance (GMQA) conducted an in-depth assessment of Georgia Power Company QA Department practices and identified the weaknesses that had previously resulted in the deficiencies identified by the NRC inspection report. The conduct, results and actions of the GMQA's evaluation were discussed in detail with NRC representatives at the exit continuation meetings on July 2 and 5, 1984. The key actions taken to resolve the weaknesses found by the GMQA involved major changes to the QA Department procedures and practices in February, 1983. These changes significantly strengthened the planning, control and supervisory involvement in the QA audit process. For example, the audit process now includes:
  - a discussion and approval by QA management of the audit objectives prior to beginning the audit;
  - a discussion between the audit team and QA management of the progress and potential findings of the audit about midway through the audit; and
  - a discussion of the entire audit and a review of the initial report draft prior to scheduling the exit meeting.

Subsequent to the development and implementation of these upgraded practices in early 1983, problems like those identified in the NRC inspection report have not recurred.

- (5) Full compliance to applicable regulatory requirements was and has been achieved since actions taken in February, 1983. Corrective actions in paragraph 2 will be completed by September 28, 1984.

**Violation 50-424, 425/84-14-02, "Incomplete Corrective Action for Closure of Audit Findings" - Severity Level IV.**

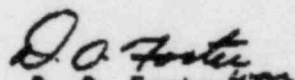
- (1) Georgia Power Company acknowledges the discrepancies identified in the violation.
- (2) Audit Finding Reports CD06-81/51-235 and CD06-81/51-236 were poorly written in that insufficient detail was provided to assure that corrective actions could be effectively accomplished by the audited organization. In fact, remedial actions had been taken by the audited organization and long-term corrective actions were in progress for the two audit findings at the time of their closure. Closure was based on the past effectiveness of the audited organization in addressing audit findings and on the QA Site Supervisor's

determination that full resolution was forthcoming for both items. There was, however, no objective evidence available to substantiate whether long-term corrective actions were accomplished as committed.

- (3) A review of actions taken relative to the concerns of Audit Finding Reports 235 and 236 determined that long-term corrective actions to resolve the findings have been accomplished with one exception involving the design basis accident (DBA) testing of coating materials. DBA testing for coating materials used at the Vogtle Electric Generating Plant has been accomplished, but discrepancies exist between the DBA conditions noted in the Vogtle Final Safety Analysis Report, typical DBA test conditions prescribed in ANSI N101.2-1972, and DBA test data for some of the coating materials. The General Manager - Project Engineering and Licensing is in the process of resolving these discrepancies.
- (4) Major changes to upgrade QA Department audit practices, as discussed above were implemented in February, 1983. These changes significantly strengthened the corrective action practices for audit findings and included the requirement that objective evidence of the adequacy and completion of corrective actions be available for review prior to closure of Audit Finding Reports. Compliance with this requirement has prevented further violations such as those identified in the NRC inspection report.
- (5) The General Manager - Project Engineering and Licensing has informed QA that discrepancies relative to DBA testing of coating materials are being evaluated and are expected to be resolved by September 28, 1984. All corrective actions will be complete and full compliance with applicable regulatory requirements will be achieved at that time.

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

Yours truly,

  
D. O. Foster

REF/DOF/tdm

xc: U. S. Nuclear Regulatory Commission  
Attn: Victor J. Stello, Jr., Director  
Office of Inspection and Enforcement  
Washington, D. C. 20555

R. J. Kelly	D. E. Dutton	J. A. Bailey	L. T. Gucwa
R. E. Conway	W. F. Sanders	O. Batum	M. Malcom
G. F. Head	R. H. Pinson	H. H. Gregory	G. Bockhold
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