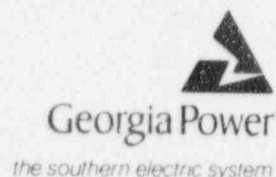


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C. K. McCoy  
Vice President, Nuclear  
Vogtle Project



June 3, 1996

LCV-0793-A

Docket No. 50-424  
50-425

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

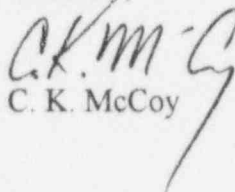
Ladies and Gentlemen:

**VOGTLE ELECTRIC GENERATING PLANT  
REPLY TO A NOTICE OF VIOLATION**

Pursuant to 10 CFR 2.201, Georgia Power Company submits the enclosed information for Vogtle Electric Generating Plant in response to violations identified in Nuclear Regulatory Commission (NRC) Inspection Reports 50-424,425/96-02, which documents the inspection conducted by NRC Resident Inspectors from March 3, 1996, through April 17, 1996.

Should you have any questions feel free to contact this office.

Sincerely,

  
C. K. McCoy

CKM/AFS

Enclosure: Reply to NOV 50-424,425/ 96-02

cc: Georgia Power Company  
Mr. J. B. Beasley, Jr.  
Mr. M. Sheibani  
NORMS

070019

U. S. Nuclear Regulatory Commission  
Mr. S. D. Ebner, Regional Administrator  
Mr. L. L. Wheeler, Licensing Project Manager, NRR  
Mr. C. L. Ogle, Senior Resident Inspector, Vogtle

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**ENCLOSURE**

**VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2  
REPLY TO A NOTICE OF VIOLATION  
NRC INSPECTION REPORTS 50-424; 425/96-02**

"During the NRC inspections conducted from March 3 through April 13, 1996, violations of NRC requirements were identified. In accordance with the 'General Statement of Policy and Procedures for NRC Enforcement Actions,' NUREG-1600, the violations are listed below:"

**VIOLATION A, 50-424;425/96-02-02**

The following is a transcription of violation A as cited in the Notice of Violation (NOV):

- A. "Technical Specifications 6.7.1.a requires that written procedures be implemented covering activities delineated in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Rev. 2, February 1978, requires that procedures be implemented for performing maintenance.

Procedure 20429-C, Short Term Documentation of Temporary Jumpers and Lifted Wires, provides instructions to document wire removal and replacement during maintenance and requires workers independently verify wiring has been removed and connected properly.

Contrary to the above, on March 29, 1996, a maintenance technician failed to properly replace wires in the control circuit for valve 1-HV-5132, auxiliary feedwater train B pump discharge to steam generator number 2, as designated on the power and removal/replacement data sheet performed pursuant to Procedure 20429-C. The resultant wiring error was also not detected during the independent verification performed in accordance with Procedure 20429-C.

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

**RESPONSE TO VIOLATION A (50-424;425/96-02-02)**

**Admission or Denial of the Violation:**

This violation occurred as stated in the notice of violation.

**Reason for the Violation:**

This violation was a result of personnel error.

The maintenance technicians performing work on the control circuit for valve 1-HV-5132, failed to properly replace the wires and perform the independent verification as required by the applicable procedure. The technicians indicated they understood the procedure and the maintenance task; however, the sense of urgency to complete the task to support testing resulted in the errors. Additionally, the wiring cubicle is located at the top of the motor control center which makes it difficult to access without a ladder.

## **ENCLOSURE**

### **VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424; 425/96-02**

The technicians stated they did not utilize a ladder while performing the task, thus making it difficult to accurately complete the wiring and perform an adequate independent verification.

#### **Corrective Steps Which Have Been Taken and the Results Achieved:**

The technicians involved were counseled concerning this violation and the importance of following procedures and accurately performing maintenance activities.

#### **Corrective Steps Which Will Be Taken to Avoid Further Violations:**

This violation will be included in the Maintenance Department continuing training with emphasis on using the correct tools for the maintenance task, accurately performing activities in accordance with the procedure and performing adequate independent verifications. Estimated completion date is September 15, 1996.

#### **Date When Full Compliance Will Be Achieved:**

Full compliance was achieved on April 1, 1996, when the wiring was correctly landed per the applicable requirements. The wiring discrepancy was corrected prior to Unit 1 entering mode 3, therefore no violation of Technical Specifications occurred.

#### **VIOLATION B, 50-424;425/96-02-04**

The following is a transcription of violation B as cited in the Notice of Violation (NOV):

- B. "10 CFR 50, Appendix B, Criterion XVI, Corrective Action, requires that measures be taken to preclude repetition of significant conditions adverse to quality.

Contrary to the above, the corrective actions taken in response to the as found lift setpoint of pressurizer code safety relief valve 1-PSV-8010C, being outside of Technical Specification limits were inadequate to preclude repetition. Specifically, the as found lift setpoint was outside technical specification tolerances during all six verification tests conducted between June 1, 1987, and March 14, 1996.

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

#### **RESPONSE TO VIOLATION B (50-424;425/96-02-04)**

#### **Admission or Denial of the Violation:**

This violation occurred as stated in the notice of violation.

## **ENCLOSURE**

### **VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424; 425/96-02**

#### **Reason for the Violation:**

VEGP acknowledges that previous corrective actions to address initial setpoint verifications for pressurizer code safety relief valve 1-PSV-8010C, have not precluded repetition and that this valve has failed its initial setpoint verification each time it was tested. However, prior to the valve being returned to service and considered to be operating correctly, valve setpoints were verified to be within Technical Specification limits.

It is recognized at VEGP and throughout the industry that setpoint drift is a common problem associated with this type of valve design in this application. Previous corrective actions to address the setpoint problems included minor adjustments to the valve and an evaluation of the potential for a relaxation of the setpoint. Additionally, design modifications to the existing valves and different valve designs were evaluated in an attempt to improve the reliability of pressurizer code safety valves. These evaluations did not reveal any alternatives which would be more reliable or less restrictive than the existing design. VEGP realizes that the above stated corrective actions to address setpoint problems were not sufficient to prevent repetitive failures from occurring for valve 1-PSV-8010C.

#### **Corrective Steps Which Have Been Taken and the Results Achieved:**

Due to erratic valve behavior observed during setpoint verification testing performed in the last refueling outage, it was determined that rework of valve 1-PSV-8010C would be required. Upon disassembly, a worn bellows/disc holder assembly was discovered and replaced. This should improve the setpoint characteristics and increase the probability the valve will lift within its allowed tolerance during testing in subsequent refueling outages.

#### **Corrective Steps Which Will Be Taken to Avoid Further Violations:**

After determining that the setpoint was outside of TS tolerance during the last refueling outage, an assessment was made of the potential consequences of the as-found setpoint. It was estimated that the safety valve would be capable of performing its safety function at the as-found setpoint. Based on this estimate, an engineering analysis will be performed to determine the possibility of an increase in the setpoint tolerance. Completion date for the engineering analysis is December 1, 1996.

#### **Date When Full Compliance Will Be Achieved:**

Full compliance was achieved on March 23, 1996, when the valve was repaired and tested in accordance with the Technical Specifications.

## ENCLOSURE

### VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424; 425/96-02

#### VIOLATION C, 50-424;425/96-02-07

The following is a transcription of violation C as cited in the Notice of Violation (NOV):

- C. "Technical Specification 6.10, Radiation Protection Program, requires that procedures consistent with the requirements of 10 CFR Part 20 be adhered to for all operations involving personnel radiation exposure.

Procedure 00930-C, Radiation and Contamination Control, establishes requirements for monitoring and controlling exposure to radiation and contamination. This procedure requires that radiological signs and ropes not be removed unless authorized by health physics personnel.

Contrary to the above, on April 12, 1996, a radiological rope and radiation area sign in room B-11 of the Fuel Handling Building were removed without health physics authorization.

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

#### RESPONSE TO VIOLATION C (50-424;425/96-02-07)

##### Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

##### Reason for the Violation:

On April 12, 1996, a health physics technician performed a survey in room B-13 of the Fueling Handling Building prior to the installation of concrete blocks in a block-out wall. The results of the survey indicated the block-out area was not contaminated. The health physics technician informed the maintenance worker that the contaminated area posting, which was at the entrance of the block-out area, could be removed. Due to miscommunications between the health physics technician and the maintenance worker, a radiation area posting for room B-11 was removed in addition to removing the contaminated area posting at room B-13. Room B-13 is accessed by passing through room B-11.

##### Corrective Steps Which Have Been Taken and the Results Achieved:

1. A shift briefing was presented to health physics technicians and foremen describing the violation and the applicable corrective actions taken.
2. General Employee Training has been enhanced to stress the importance of radiological postings.

## ENCLOSURE

### VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424; 425/96-02

3. A policy was implemented allowing only qualified health physics personnel to affix, remove or relocate radiological postings, barriers or labels.

#### Corrective Steps Which Will Be Taken to Avoid Further Violations:

No additional corrective actions are planned at this time.

#### Date When Full Compliance Will Be Achieved:

Full compliance was achieved on April 12, 1996, when room B-11 was posted as a radiation area.

#### VIOLATION D, 50-424;425/96-02-08

The following is a transcription of violation D as cited in the Notice of Violation (NOV):

- D. "Technical Specification 6.10, Radiation Protection Program, requires that procedures for personnel radiation protection be prepared consistent with the requirements for 10 CFR 20 and be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

Procedure 46017-C, Control, Monitoring and Removal of Materials in Radiation Controlled Areas, states that rad material containers which are less than two mRem/hr. on contact should be labeled 'Caution Radioactive Material' with no other information required. 10 CFR Part 20.1904 (a) requires that labels for rad material containers (containing greater than 10 CFR Part 20, Appendix C quantities) include sufficient information to permit individuals handling them to take precautions to minimize exposures (such as radiation levels, quantity of radioactivity, date, etc.).

Contrary to the above, Procedure 46017-C was not prepared consistent with the requirements of 10 CFR Part 20.1904 (a) in that rad material containers which may contain greater than 10 CFR Part 20, Appendix C quantities are not required to be labeled with sufficient information as required by 10 CFR Part 20.1904 (a).

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

#### RESPONSE TO VIOLATION D (50-424;425/96-02-08)

#### Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.



## ENCLOSURE

### VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424; 425/96-02

#### Reason for the Violation:

Procedure 46017-C, "Control, Monitoring and Removal of Materials in Radiation Controlled Areas", was revised to state that radioactive material containers which are less than two mRem/hr. on contact should be labeled "Caution Radioactive Material" with no other information required. Previous revisions to the procedure required the labels to provide sufficient information such as dose rates, contamination levels, kinds of material and date of assessment in addition to "Caution Radioactive Material." The procedure was revised after a review of industry practices and applicable requirements relating to radiological posting was conducted. It was concluded that the intent of 10 CFR Part 20.1904 (a) would be met in that a radioactive material tag should require no other specific information other than "Caution Radioactive Material" for containers with less than two mRem/hr. on contact. The level of detail on the label would be commensurate with the level of hazard with no compromise to radiation protection. This violation was a result of VEGP's interpretation of 10 CFR Part 20.1904 (a).

#### Corrective Steps Which Have Been Taken and the Results Achieved:

1. Procedure 46017-C was revised on March 29, 1996, to require that radioactive material containers be labeled "Caution Radioactive Material" with sufficient information such as dose rates, contamination levels, kinds of material and date of assessment.
2. A shift briefing was conducted for health physics personnel involved in the procedure revision process to stress the importance of ensuring that applicable regulatory requirements are not misinterpreted.

#### Corrective Steps Which Will Be Taken to Avoid Further Violations:

No additional corrective actions are planned at this time.

#### Date When Full Compliance Will Be Achieved:

Full compliance was achieved on March 29, 1996, when procedure 46017-C was revised.