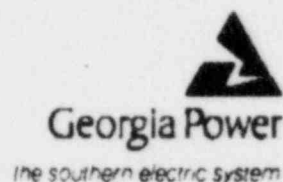


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D. O. Foster
Vice President and Project
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Vogtle Project



April 16, 1985

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
101 Marietta Street, Northwest
Atlanta, Georgia 30323

File: X7BG10
Log: GN-582

Reference: 50-424/85-06, 50-425/85-06

Attention: Mr. Roger D. Walker

The Georgia Power Company wishes to submit the following information in response to the violation identified in USNRC inspection report 50-424/85-06 and 50-425/85-06.

Violation 50-424, 425/85-06-03, "Filler Plates With Pipe Straps Are Being Utilized Without Proper Documentation" - Severity Level IV.

The violation identifies a failure to submit design changes involving filler plates and filler plate welds in conjunction with pipe straps to the Project Engineer for review and acceptance. Georgia Power Company offers the following response pursuant to the criteria of 10 CFR 2.201:

Georgia Power Company acknowledges the violation to the extent noted below.

Paragraph P5.6.5 of specification X4AZ01 states that modifications made within the tolerances and limitations of paragraph P5.6.4 may be made without engineering approval or formal documentation. The use of filler plates is addressed in paragraph P5.6.4.L.7 and depicted in figures P5.6.4-12 and 12a.

After reviewing Pullman Power Products Procedure IX-50, "Pipe Support Field Installation and Fabrication Procedure," it is our conclusion that the use of filler plates in conjunction with pipe straps has been conducted within the tolerances of the specification and, therefore, formal documentation and engineering approval is not required.

An additional problem was discussed during the NRC's exit meeting of February 14, 1985, concerning overstressed pipe strap filler plate (less than 3/8" thick). Georgia Power wishes to address this problem although it is not specifically mentioned in the violation.

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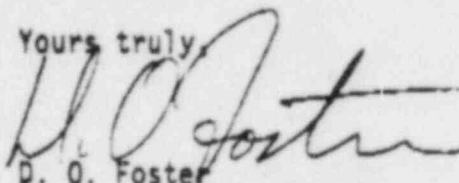
Page Two

We acknowledge the specification did not contain adequate limitations for the installation of filler plates within this thickness range. The following corrective action plan has been established:

1. Pullman has been directed to discontinue installation of pipe strap filler plates in this thickness range (less than 3/8" thick) until specification X4AZ01 can be revised to show an acceptable installation detail.
2. By May 1, 1985, Bechtel will revise the specification as noted above.
3. By June 1, 1985, Georgia Power Company will identify previously installed strap restraints with filler plates of less than 3/8" thickness.
4. This information will be forwarded to Bechtel for engineering evaluation to determine the acceptability of each hanger. Calculations will be updated and hanger drawings will be revised to show filler plates and any necessary rework. This action will be complete by July 1, 1985.

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
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