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

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Reference: 50-424/85-07, 50-425/85-07

Attention: Mr. Roger D. Walker

The Georgia Power Company wishes to submit the following information in response to the violations identified in USNRC inspection report 50-424/85-07 and 50-425/85-07.

Violation 50-425/85-07-01, "Failure to Follow Procedures for Control of Tools Used on Stainless Steel" - Severity Level V

This violation identified the use of tools, such as wire brushes and grinding wheels, on stainless steel reactor coolant piping welds, which were apparently designated for use on carbon steel since they were not marked with red paint as required by Pullman Power Products procedures for tools to be used on stainless steel. Georgia Power Company offers the following response pursuant to the criteria of 10 CFR 2.201:

1. Georgia Power Company acknowledges the violation as identified in the USNRC inspection report.
2. The violation is attributed to a failure to remind craft personnel to ensure that only properly marked tools are used on stainless steel work and a failure by Pullman Power Products QC personnel to adequately enforce the tool controls established in procedures.
3. All known cases in which unmarked tools were used on stainless steel were identified by Pullman Power Products in Deviation Reports. The approved corrective actions resulting from the Deviation Reports included acetone cleaning and rebuffing of the affected areas.
4. To prevent further violations, a memorandum of reinstruction was distributed to applicable Pullman Power Products craft and QC personnel which outlined procedural requirements for tool control and insisted that the controls be observed and enforced.
5. All corrective actions have been completed and full compliance with applicable requirements has been achieved.

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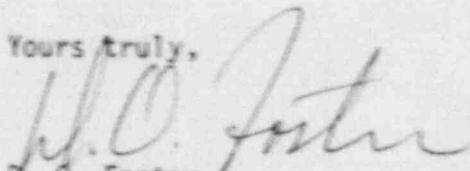
Violation 50-425/85-07-02, "Failure to Follow Procedure for Fit-Up Inspection of Reactor Coolant Pressure Boundary Piping" - Severity Level V.

This violation identified a reactor coolant piping weld (2-1201-006-W-01) which had received a fit-up inspection and was accepted even though the welder's symbol had not been stamped on the pipe near the weld as required by Pullman Power Products procedure X-18. Georgia Power Company offers the following response pursuant to the criteria of 10 CFR 2.201:

1. Georgia Power Company acknowledges the violation as identified in the USNRC inspection report.
2. Pullman Power Products has conducted an evaluation of the discrepancy which included discussions with responsible quality control inspection personnel. Based on this evaluation Pullman Power Products has concluded that the discrepancy is an isolated case of failure by a QC inspector to ensure the weld was properly marked with the welders symbol.
3. Even though a failure to follow procedure did occur, the welder's identification and symbol were recorded on quality assurance documentation, such as the rod ticket and process sheet, which are traceable to the weld. Weld 2-1201-006-W-01 has now been properly marked with the welder's symbol.
4. To prevent further violations, Pullman Power Products QC personnel will be reinstructed in the procedural requirements for fit-up inspections.
5. All corrective actions will be completed by April 26, 1985. Full compliance with applicable 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

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