

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



June 14, 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-641

Reference: 50-424/84-36, 50-425/84-36

Attention: Mr. J. Nelson Grace

The Georgia Power Company wishes to submit the following supplemental information to our response (GN-571, dated April 2, 1985) to USNRC Inspection Report 50-424, 425/84-36.

Violation 50-424, 425/84-36-01 identified two specific cases of failure by Pullman Power Products personnel to follow nondestructive examination (NDE) procedures. In one case, magnetic particle examinations were conducted without verifying magnetic field adequacy with a magnetic field indicator. In the other case, ultrasonic thickness examinations were conducted without performing an intermediate thickness verification. In its response, Georgia Power Company indicated that additional evaluations would be conducted to establish a confidence level for the adequacy of previous nondestructive examinations of the types identified in the violation. The additional evaluations have been completed and are summarized below:

1. Ultrasonic Thickness Measurements - Pullman Power Products conducted a re-examination and evaluation of a representative sample of previous ultrasonic examinations performed by the technician involved in the specific case cited in the violation. A total of forty-eight examinations were performed by the technician prior to the NRC inspection. Using Military Standard 105-D to produce an acceptable sample size, eight of the forty-eight examinations were randomly selected for re-evaluation. Re-examination results were evaluated and were found to be acceptable in all cases.
2. Magnetic Particle Examinations - Pullman Power Products conducted an evaluation of the technique cited in the violation to determine the reliability of examination results when a magnetic field indicator is not used. The evaluation included a series of examinations of test specimens with known surface and subsurface defects using established techniques of yoke pole placements. The test examinations were conducted without the use of a magnetic field indicator

8507100347 850614
PDR ADOCK 05000424
Q PDR

IE01 1/0

with a standard Y-6 yoke. Since the current output is not adjustable using the yoke with alternating current, the magnetic field strength is constant on the part being examined; therefore, the only variable involved is pole placement. The test examinations were then repeated using a magnetic field indicator to verify that an adequate magnetic field was established. The evaluation concluded that all of the known surface indications and even some of the subsurface indications were detected using the established pole placement techniques. Magnetic field strength was shown to be well established for flat weld configurations and adequate, though somewhat reduced, to detect surface discontinuities in corner welds and terminations.

Based on the results of these evaluations, it is Georgia Power Company's position that adequate confidence levels have been established for the adequacy of previous nondestructive examinations of the types identified in the violation and that no additional corrective actions other than those described in our response of April 2, 1985, are required.

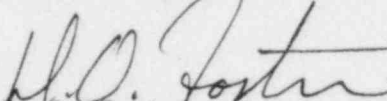
Violation 50-424, 425/84-36-03 identified a failure in Pullman Power Products procedures to provide or reference required manufacturer instructions for the installation of spring hangers and pipe clamps. As a result, Pullman Power Products personnel installed and inspected pipe support components without details of the manufacturer's instructions. In its response, Georgia Power Company indicated that a sampling program would be established to determine the acceptability of previously installed pipe supports requiring the use of manufacturer instructions, and committed to provide a report to the NRC by June 15, 1985, giving either the results of the sample evaluation or a schedule for its completion. The status and schedule for completing the evaluation is presented in the following summary:

1. The population of pipe supports installed and inspected prior to the correction of Pullman Power Products' procedure have been identified and listed. The list consists of approximately 3300 supports.
2. Using standard statistical sampling techniques designed to provide a representative sample of the entire population, fifty-nine supports were randomly selected from the list for reinspection.
3. Pullman Power Products is presently developing a reinspection program for the specific pipe support attributes for which manufacturer instructions are required. Reinspection of the sample of fifty-nine supports is expected to begin by July 1, 1985.
4. The results of the reinspection will be submitted to Georgia Power Company by July 20, 1985. All nonconformances will be reported and dispositioned through established procedures.
5. Georgia Power Company and Bechtel Power Corporation, the Vogtle Project architect/engineer, will evaluate the results of the reinspection and determine if any additional actions are required. This evaluation is expected to be completed by mid-August.

Based on this schedule, Georgia Power Company expects to provide a report to the NRC by August 30, 1985, giving the results of this evaluation.

This report 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
Document Control Desk
Washington, D. C. 20555

R. J. Kelly
R. E. Conway
G. F. Head
J. T. Beckham
R. A. Thomas
D. E. Dutton
W. F. Sanders (NRC)
R. H. Pinson
B. M. Guthrie
E. D. Groover
R. W. McManus

J. A. Bailey
O. Batum
H. H. Gregory
W. T. Nickerson
D. R. Altman
D. L. Kinnsch (BPC)
J. L. Vota (W)
L. T. Gucwa
C. E. Belflower
F. B. Marsh (BPC)
G. A. McCarley

G. Bockhold
P. D. Rice
C. S. McCall (OPC)
E. L. Blake, Jr.
(Shaw, et. al.)
J. E. Joiner
(Troutman, et. al.)
D. C. Teper (GANE)
L. Fowler (LEAF)
T. Johnson (ECPG)