

July 16, 1985

Dockets Nos. 50-321
and 50-366

Mr. J. T. Beckham, Jr.
Vice President - Nuclear Generation
Georgia Power Company
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Dear Mr. Beckham:

We have reviewed your letters dated April 16 and May 3, 1985 responding to our letter of January 28, 1985 concerning an allegation that Georgia Power Company (GPC) is not complying with the requirements of Section XI of the ASME Boiler and Pressure Vessel Code concerning the use of an Authorized Nuclear Inspector (ANI).

Your April 16, 1985 response, clarified by your May 3, 1985 letter, states in part that "while an ANI is not always used, particularly during maintenance repairs (e.g., valves), an ANI has been used on a case-by-case basis dependent upon the nature of the repair/replacement. It also states that "GPC Quality Control provides essentially the same function as the ANI by performing inspections of repairs, review of procedures, etc. Further, GPC Quality Assurance audits repairs on a selected basis." While no formal 'repair or replacement program' document exists for every repair/replacement performed, all elements that would be included in such a document do exist and are subject to audit by NRC inspection personnel during repair/replacement activities". The letter requests that the NRC concur with GPC's use of its quality assurance (QA)/quality control (QC) inspectors for routine repairs supplemented on a case-by-case basis by an independent ANI.

Section XI states that the rules for Nuclear Power Plants are mandatory and the duties of the ANI are assigned by Section XI to verify, assure, or witness that the responsibilities of the Owner and the mandatory requirements are met. These duties include verifying (1) that the required examinations, pressure tests, and tests on pumps and valves have been performed and the results recorded, (2) that non-destructive examination methods used follow the techniques specified, (3) that the examinations are performed in accordance with written qualified procedures and by personnel qualified as specified, and (4) that repairs are performed in accordance with the requirements of the Owner's repair program. The repairs/replacements governed by Section XI are those made to Class 1, 2, or 3 pressure retaining components and their supports, including appurtenances and subassemblies or parts of a component and core support structures, in which welding is required. It is the Owner's responsibility to be in possession of an arrangement with an Authorized Inspection Agency to provide the inspection services when the Owner is performing any test, examination, or repair/replacement of a Class 1, 2, or 3 system or component governed by the rules of Section XI.

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Mr. Beckham

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While the GPC QA program and QC inspectors provide elements essential to plant safety, they do not and were not intended to function as the Authorized Inspection Agency or the Authorized Nuclear Inspector. Since the ANI's duties entail verification that the Owner's responsibilities have been met, the staff cannot concur with the use of GPC's QA/QC inspectors to substitute for the ANI nor make a determination that the requirement is impractical. The requirements of Section XI for the use of the ANI, therefore, should be complied with by GPC when performing any test, examination, or repair/replacement of a Class 1, 2, or 3 system or component governed by the rules of Section XI at Hatch Units 1 & 2.

Sincerely,

Handwritten signature of John F. Stolz
"JOHN F. STOLZ"

John F. Stolz, Chief
Operating Reactors Branch #4
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cc: See next page

Handwritten initials
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GRivenbark;cr
7/16/85

Handwritten signature of John F. Stolz
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7/16/85

Mr. J. T. Beckham, Jr.
Georgia Power Company

Edwin I. Hatch Nuclear Plant,
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