



Georgia Power

D. O. Foster
President and Project
General Manager
Logan Branch

June 27, 1985

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

File: XZBG10
Log: GN-648

Reference: 50-424/85-16, 50-425/85-16

Attention: Roger D. Walker

The Georgia Power Company wishes to submit the following information concerning the violations identified in your inspection report 50-424/85-16 and 50-425/85-16:

Violation 50-424, 425/85-16-01, "Inadequate Procedure for the Installation and Inspection of Cable Supports in Electrical Penetrations" - Severity Level IV

This violation identified a failure to include provisions in drawings or instructions for the determination of when the manufacturer's cable support loading limit of 300 ft-lb moment was reached. Georgia Power Company offers the following response pursuant to the criteria of 10 CFR 2.201:

1. Georgia Power Company acknowledges the violation to the extent noted below.
2. The electrical penetrations are manufactured by Conax. The Conax vendor manual and the general notes on drawing CX3DF006 allow the use of Unistrut materials for cable support fabrication. Georgia Power Company procedure ED-T-08 requires that material and bolt torque meet design requirements. The only restraint applied by the manufacturer for cable support configuration is the 300 ft-lb total moment limit. Verification of compliance with the 300 ft-lb limit is performed by engineering by in-process monitoring during cable support installation and by calculation upon completion of all terminations in each electrical penetration. The verifications performed by engineering, however, were not procedurally controlled.
3. Some of the calculations to verify compliance with the 300 ft-lb moment loading of electrical penetration cable supports have been completed by engineering. A review was conducted of these calculations and no case was found where cable supports were overloaded.

4. To prevent future violations, an area turnover procedure is being developed which will include provisions for engineering's verification of cable support moment loading limitations. These verifications will be completed for each electrical penetration prior to area turnover.
5. All corrective actions relative to this violation are expected to be completed by August 20, 1985.

Violation 50-424, 425/85-16-02, "No directions for Acceptance/Rejection of Deviation Reports" - Severity Level IV

The Notice of Violation states that no guidelines or criteria were found in procedure GD-T-01 to guide the Quality Control (QC) supervisors in determining the acceptability of deviation reports (DR's). Georgia Power Company offers the following response pursuant to the criteria of 10 CFR 2.201:

1. Georgia Power Company acknowledges the violation.
2. Procedure GD-T-01 provides instructions for determining when and how to initiate a DR. These same instructions are used by QC supervisors to determine if a "potential" DR is valid. Georgia Power Company did not feel that separate criteria for supervisors to determine the validity of potential DR's was necessary. However, the instructions in procedure GD-T-01 were not clear in all cases, which resulted in disagreements between some inspectors and their supervisors relative to the validity of potential DR's. In addition, procedure GD-T-01 contains no provisions for the control of potential DR's while under review by QC supervisors and before receiving a controlling number.
3. Georgia Power Company has developed an interim numbering system for potential DR's rejected as invalid by QC supervisors until revisions to procedure GD-T-01 can be finalized.
4. To prevent future violations, procedure GD-T-01 is undergoing a complete revision to provide clear and concise direction in the initiation, review, approval, disposition, tracking, and closure of DR's. The need for a revision to GD-T-01 was also identified by Georgia Power Company during an electrical assessment audit conducted in March and April, 1985. Potential DR's will be given numbers from the master DR control log before they are reviewed for validity by QC supervisors. Rejected potential DR's will be discussed with the initiator, reviewed by the QC Manager or his designee for concurrence, and filed in the QA records vault. In addition, a Technical Support Group has been organized which will provide technical guidance and interpretations for QC personnel in the conduction of inspections and the initiation and resolution of deviation reports.
5. The corrective actions described above are expected to be completed by July 12, 1985, when Revision 12 of procedure GD-T-01 is issued for use.

Violation 50-424, 425/85-16-03, "Failure to Disposition Deviation Reports in Accordance with Procedures" - Severity Level IV

This violation identifies the failure to adequately correct the reported conditions in deviation reports ED-08440, ED-06060, and ED-05471. Georgia Power Company offers the following response pursuant to the criteria of 10 CFR 2.201:

1. Georgia Power Company acknowledges the violation.
2. As indicated in the response to item 85-16-02, the instructions in procedure GD-T-01 were not clear in all cases. The procedure lacked sufficient detail to provide consistent documentation and resolution of identified nonconformances. It should be noted that a QA electrical assessment audit, conducted in March and April, 1985, also identified similar weaknesses in the nonconformance control program.
3. An evaluation was conducted of the three deviation reports cited in the violation. The evaluations involved reviews of supporting documentation and discussions with involved personnel. The evaluations determined that the identified nonconformances were properly resolved in each case; however, the deviation reports lacked sufficient information to describe all actions taken and to demonstrate that full resolution had been accomplished.
4. A complete revision of procedure GD-T-01, "Nonconformance Control", is in progress to eliminate the weaknesses in the nonconformance control program. The new procedure will provide clear and concise direction in the initiation, review, approval, disposition, tracking, and closure of DR's.

The component removal procedure (GD-T-08) is also being revised to provide better traceability of removed and re-installed components.

A Technical Support Group has been organized which will provide technical guidance and interpretations for QC personnel. This group will also review and monitor electrical deviation reports to ensure that dispositions and corrective actions adequately resolve the identified nonconformances.

5. The corrective actions described above are expected to be completed by July 12, 1985.

Violation 50-424, 425/85-16-04, "Failure to Post Form NRC-3 and Part 21 Information in Three Operation Areas" - Severity Level V

This violation identified a failure to post forms NRC-3 and Part 21 in or near the Nuclear Operations Administration Building, the Service Building, and the Maintenance Building. Georgia Power Company offers the following response pursuant to the criteria of 10 CFR 2.201:

1. Georgia Power Company acknowledges the violation.
2. When the Administration Building was first occupied, posters containing a policy statement, Section 206 of the Energy Reorganization Act of 1974, and a 10 CFR 21 notification statement were placed in three locations in an attempt to comply with applicable regulations. A Nuclear Operations procedure for the posting of documents had not yet been developed. Since that time, no periodic checks were made to verify that posted documents were current and in good condition or to determine if any further posting was required.
3. The same day the violation was pointed out by the NRC inspector, the required documents were posted in conspicuous locations in the three Nuclear Operations buildings.
4. To prevent further violations, Nuclear Operations procedure 00255-C, "Document Posting Responsibilities", will be revised to require periodic checks of posted documents to ensure they are current and in good condition.
5. Revisions to procedure 00255-C are expected to be completed by July 31, 1985. Full compliance with applicable regulatory requirements will be achieved at that time.

Violation 40-424, 425/85-16-05, "Failure to Assemble Battery Racks in Accordance with Approved Instructions" - Severity Level IV

This violation involved racks for batteries 1AD1B, 1CD1B, and 1BD1B which were assembled, inspected, and released for testing without meeting all of the manufacturer's requirements. Georgia Power Company offers the following response pursuant to the requirements of 10 CFR 2.201:

1. Georgia Power Company acknowledges the violation.
2. A review was conducted of the manufacturer's instructions and drawings used in the fabrication and installation of the subject battery racks. These instructions and drawings do not have specific requirements that the end bracket of the rack be snug against the batteries. Also, by reviewing the drawings, it is obvious that the length of the rack depends upon the spacing between the batteries. The spacing between the batteries is dependent upon the tie busses for the terminal posts. Any manufacturing tolerance in the tie busses and batteries will affect the overall length of the completed assembly. The racks and batteries were fabricated using materials supplied by the manufacturer and were assembled in accordance with the manufacturer's instructions and drawings.

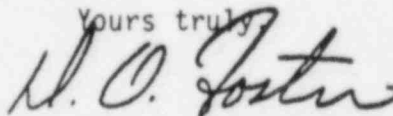
C&D Batteries, the manufacturer, was contacted on April 24, 1985, and asked if there was an additional requirement not shown on the design documents for batteries to be snug against the end bracket. The manufacturer responded in the affirmative. It should be noted that this contact with the manufacturer was the first knowledge

Georgia Power Company had of this new design requirement and that the battery racks were inspected, accepted, and turned-over for testing before the contact occurred.

3. Georgia Power Company will retrofit the battery racks in question to comply with the new design requirement. Nuclear Operations deviation reports T-185-640, T-185-641, and T-185-721 have been initiated to identify the discrepancies and to document the retrofit and reinspection.
4. This violation is considered to be an isolated case of failure by the manufacturer to provide all requirements necessary for the proper fabrication of the battery racks. No actions to prevent recurrence are necessary.
5. Authorizations to retrofit the battery racks have been approved but some replacement hardware had to be ordered from the manufacturer. The battery rack retrofit, which will be accomplished after the replacement hardware is received, is expected to be completed by December 31, 1985.

These responses contain 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)