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United States Nuclear Regulatory Commission
Region II
Suite 2900
101 Marietta Street, Northwest
Atlanta, Georgia 30323

File: X7BG10
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Reference: 50-424/85-37, 50-425/85-29

Attention: Mr. Roger D. Walker

The Georgia Power Company wishes to submit the following information concerning the violations identified in your inspection report 50-424/85-37 and 50-425/85-29:

Violation 50-424/85-37-01, "Failure to Prescribe Appropriate Procedures to Control Area Cleanliness" - Severity Level IV

The violation identified the failure of GPC field procedure GD-T-17 (Rev. 2), "Housekeeping," to establish a cleanliness zone designation for the Unit 1 safety injection train B pump room as required by ANSI N45.2.3-1973, "Housekeeping During the Construction Phase of Nuclear Power Plants," while the safety injection pump was disassembled. 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 NRC inspection report. It should be noted, however, that even though a weakness existed in the construction housekeeping procedure, cleanliness conditions and housekeeping practices in the safety injection train B pump room during pump disassembly met ANSI N45.2.3 requirements.
2. As indicated in the NRC inspection report, a revision to GPC field procedure GD-T-17 to incorporate the zone designation requirements of ANSI N45.2.3 had already been developed and was in the management review cycle at the time the violation was identified. The violation is therefore attributed to an isolated case of inadequate planning relative to procedure revision and issuance.
3. Revision 3 to field procedure GD-T-17 was issued on August 22, 1985 (five days after the violation was identified). The new revision established the safety injection train B pump room as a zone 2 cleanliness area for the remaining work on the safety injection pump.

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4. Continued proper implementation of the new revision of field procedure GD-T-17 will prevent further violations.
5. All corrective actions relative to this violation have been completed.

Violation 50-424/85-37-02, "Failure to Establish Appropriate Acceptance Criteria to Verify Pump Internal Cleanliness" - Severity Level IV.

The violation identified discrepancies between the cleanliness acceptance criteria of Pullman Power Products (PPP) procedure XIII-4 (Rev. 10/18/85), used in the disassembly, cleanliness verification, and reassembly of the Unit 1 train B safety injection pump, and Revision 9 of Westinghouse Specification No. 292722. The Westinghouse document requires a wipe test in accordance with ASTM A-380 to verify equipment internal cleanliness prior to reassembly. The PPP procedure did not contain this requirement. 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 NRC inspection report.
2. The primary purpose of PPP procedure XIII-4 is for cleaning of piping, but general requirements for cleaning of mechanical equipment such as pumps and valves are included in the procedure with a statement that additional specific requirements may be provided by the plant owner. The procedure was reviewed and approved by the architect-engineer (Bechtel Power Corporation) and Westinghouse as a pipe cleaning procedure. Knowing that procedure XIII-4 had been reviewed and accepted by engineering, Georgia Power Company failed to recognize the need to provide PPP with the additional cleanliness verification requirements of Westinghouse Process Specification No. 292722.

Representatives from both Westinghouse and Bechtel were contacted to determine the generic implications of the violation relative to other contractor cleaning procedures. It was concluded that the discrepancies identified in the violation represent an isolated incident and that the corrective actions described below will provide adequate procedural control of applicable cleaning requirements.

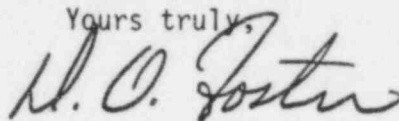
3. As corrective action, all Westinghouse equipment which has been disassembled and reassembled and was subject to the cleanliness verification requirements of Process Specification No. 292722 will be identified in a Deviation Report. The Deviation Report will then be submitted to engineering for disposition, which will include concurrence by Westinghouse.
4. To prevent further violations, PPP procedure XIII-4 will be revised to incorporate the cleanliness verification requirements of Westinghouse Process Specification No. 292722.

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5. All corrective actions are expected to be completed by December 2, 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

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