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OCT 29 1985

✓ Georgia Power Company
ATTN: Mr. D. O. Foster
Vice President and General
Manager
Route 2, Box 299A
Waynesboro, GA 30830

Dear Mr. Foster:

SUBJECT: VOGTLE READINESS REVIEW - INTERIM REVIEW QUESTIONS -
MODULE NO. 5 "OPERATIONS ORGANIZATION AND ADMINISTRATION"

We have completed an initial review of the subject module which you submitted to us on August 19, 1985, for evaluation. As a result of this initial review, the following questions and comments have been generated which need clarification and a written response.

1. On page 6 of the Commitment Matrix, please clarify if the first FSAR reference should be 13.5.1.1.N rather than 13.5.1.2.G. The commitment subject is ECCS Outage Data Procedures.
2. On page 35 of the Commitment Matrix, the commitment with regard to Q420.5 should state that the analysis will be provided concurrent with the setpoint methodology in lieu of the first quarter of 1985.
3. The commitment "Settlement Monitoring Program," on page 34 does not correctly reflect the agreements reached with the applicant on this subject. The matrix should be revised to correctly identify the monitoring commitments that cover specific settlement markers to be monitored, frequency of surveying, need for monitoring following unusual events (e.g., earthquake or large fluctuation in groundwater levels), and allowable total and differential settlement limits as described in the applicant's letter of May 21, 1985, and in the June 1985, SER in Sections 2.5.4.4.3 and 2.5.4.5.

It appears the commitment matrix should also include a subject for permanent groundwater monitoring. The applicant has committed to numerous features of the monitoring program in FSAR Sections 2.4.12, 2.4.5 and in response to question 241.10. In addition to the FSAR, details of the program are also contained in the Groundwater Supplement and the Geotechnical Verification Work Report transmitted by letters, Bailey to Denton, dated May 21, 1985, and August 23, 1985, respectively.

The groundwater monitoring program will be controlled by a License Condition, the draft of which is to be provided in SER Supplement No. 1.

4. Section 3.4, "Commitment Matrix," Table 3.0-1, "Commitments for Plant Operations", page 2, ANSI N45.2.9-1972 should be changed to read ANSI N45.2.9-1974.

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5. Section 3.5, "Implementation Matrix," Table 3.0-2, "Implementing Documents for Operations," pages 4 and 5 reference FSAR Commitment 1.9.38 which endorses ANSI N45.2.2-1975. Page 1.9-36 of the FSAR lists the endorsed ANSI Standard as N45.2.2-1972. Pages 4 and 5 of the table should be changed to reflect the correct date of 1972.
6. The commitment in Table 3.0-1 by the applicant, to provide a Reactor Vessel Material Surveillance Program for Vogtle is acceptable as stated on page 34, Q241.1. In addition, the applicant should commit to operating the reactor vessel in accordance with pressure temperature limits. The pressure temperature limits must consider the effect that neutron irradiation has on the fracture resistance of the Vogtle reactor vessel belt-line materials and must be calculated in accordance with the requirements of Appendix G, 10 CFR 50. The amount of neutron irradiation damage should be calculated using the methodology recommended by the staff in Regulatory Guide 1.99. These commitments appear to be related to plant operation and should be identified in Section 3.4 for Module 5.

Please review these comments and questions and provide a written response. Your input is requested to be received on or before November 1, 1985. In view of NRC review schedule requirements, we also request a telecon for clarification and explanation of these questions as soon as you are able to respond. Please coordinate this telecon with W. H. Rankin (404-221-4197) of my staff.

Your assistance in responding to this request for additional information is appreciated.

Sincerely,

ORIGINAL SIGNED BY
VIRGIL L. BROWNLEE

Roger D. Walker, Director
Division of Reactor Projects

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