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C. K. McCoy
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November 25, 1996

LCV-0918-A

Docket No. 50-424
50-425

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

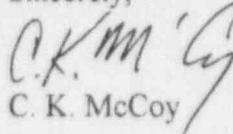
Ladies and Gentlemen:

**VOGTLE ELECTRIC GENERATING PLANT
REPLY TO A NOTICE OF VIOLATION**

Pursuant to 10 CFR 2.201, Georgia Power Company submits the enclosed information for Vogtle Electric Generating Plant in response to violations identified in Nuclear Regulatory Commission (NRC) Integrated Inspection Reports 50-424,425/96-10, which concerns the inspection conducted by NRC Resident Inspectors from August 18, 1996 through September 28, 1996.

Should you have any questions feel free to contact this office.

Sincerely,


C. K. McCoy

CKM/CTT/AFS

Enclosure: Reply to NOV 50-424,425/ 96-10

cc: Georgia Power Company

Mr. J. B. Beasley, Jr.
Mr. M. Sheibani
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U. S. Nuclear Regulatory Commission

Mr. S. D. Ebner, Regional Administrator
Mr. L. L. Wheeler, Licensing Project Manager, NRR
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ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO A NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424; 425/96-10

VIOLATION A (50-424; 425/96-10-02)

The following is a transcription of violation A as cited in the Notice of Violation (NOV):

"During an NRC inspection conducted on August 18, 1996 through September 28, 1996, violations of NRC requirements were identified. In accordance with the 'General Statement of Policy and Procedure for NRC Enforcement Actions,' (NUREG-1600), a violation is listed below:

- A. Technical Specification 6.7.1 a requires that written procedures be implemented for the activities identified in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Revision 2, February 1978, requires that procedures defining authorities and responsibilities for safe operation and shutdown be implemented.

Procedure 10000-C, Conduct of Operations, establishes the responsibilities of Operations Department personnel for conduct of plant operations and requires that control room personnel be cognizant of the status of plant equipment.

Contrary to the above, on September 16, 17, and 18, 1996, control room operators failed to detect that valve 1-HV-8220, Reactor Coolant System Hot Leg Post Accident Sampling System Sample Isolation valve, was in the incorrect position. This condition existed for approximately 55 hours.

This is a Severity Level IV violation (Supplement I) (Unit 1 only)."

RESPONSE TO VIOLATION A (50-424; 425/96-10-02)

Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

Reason for the Violation:

A design modification to install a new valve was completed on September 11, 1996, to address a previous problem with the valve inadvertently cycling open during sampling activities. Subsequent to the modification and returning the valve to service, Operations personnel periodically verified the position of the valve for several days with no abnormal alignments or problems identified. On September 19, 1996, a control room operator discovered 1-HV-8220 in the open position, whereas this is a normally closed valve. A review of data obtained from the Integrated Plant Computer determined that this valve had been open for approximately 55 hours.

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A review of operating logs and other applicable records did not identify any activities that would have required this valve to have been manipulated during the period from September 16-19, 1996. It is possible that the valve could have opened due to system pressure changes.

Corrective Steps Which Have Been Taken and the Results Achieved:

1. Immediate corrective actions upon discovery of the valve being open was to close the valve and de-energize the solenoid.
2. An additional design modification was implemented on the valve seal-in circuitry to reduce the potential for the valve to inadvertently open during system pressure changes.
3. Corrective actions implemented to address a previous violation for a mispositioned valve (1-HV-27901) also are applicable for this violation and are listed as follows:
 - a. Operations procedure 10000-C, "Conduct of Operations" has been revised to clarify expectations for periodic, methodical observations of control board indications and system alignments.
 - b. Control room rounds have been modified to include additional checks of safety-related valves and dampers.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

1. Sample alignments are being conducted periodically to provide assurance that components are in their correct position.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on September 19, 1996, when the valve was returned to the correct position.

VIOLATION B (50-424; 425/96-10-05)

The following is a transcription of violation B as cited in the Notice of Violation (NOV):

"During an NRC inspection conducted on August 18, 1996 through September 28, 1996, violations of NRC requirements were identified. In accordance with the 'General Statement of Policy and Procedure for NRC Enforcement Actions,' (NUREG-1500), a violation is listed below:

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- B. License Condition 2(E) to License Number NPF-68 issued March 16, 1987 and License Number NPF-81 issued March 31, 1989, requires the licensee fully implement all provisions of the NRC approved 'Alvin W. Vogtle Nuclear Plant Physical Security Plan.'

Paragraph 5.4.2.4 of the Physical Security Plan requires that designated vehicles inside the protected area not attended by an individual with unescorted access or a security officer as appropriate be secured to prevent movement. Possession of the keys by an authorized individual or security officer or physical restraint of the vehicle accomplishes this objective.

Procedure 00653-C, Protected Area Entry/Exit Control, Step 4.4.8 states that when a designated vehicle is left unattended in the protected area, the keys shall be kept by an authorized individual.

Contrary to the above, on August 26, 1996, an unattended designated vehicle was identified inside the protected area, with the keys in the ignition.

This is a Severity Level IV violation (Supplement III)."

RESPONSE TO VIOLATION B (50-424; 425/96-10-05)

Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

Reason for the Violation:

The violation was a result of personnel error. This violation occurred on August 26, 1996, when a refueling outage contractor left a designated vehicle (DV), a tractor, unattended in the Protected Area (PA) with the key in the ignition. This was discovered by a security officer during his routine duties. The contractor stated he was aware of the procedural requirements concerning DVs, but forgot to remove the ignition key.

Corrective Steps Which Have Been Taken and the Results Achieved:

1. Appropriate disciplinary actions were administered to the involved individual.
2. As part of administrative controls, coiled lanyards have been attached to the ignition keys of DVs to be used to attach the key to the person while operating the DV.

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Corrective Steps Which Will Be Taken to Avoid Further Violations:

1. In order to reduce the number of DVs in the PA, the Physical Security and Contingency Plan was revised concerning the classification of DVs. Applicable administrative and security department procedures will be revised to include the revised DV classification requirements. The estimated completion date is January 15, 1997.

2. General Employee Training will be revised prior to the next refueling outage to include a review of the new procedural changes concerning DV classification requirements. The estimated completion date is July, 1997.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on August 26, 1996, when the tractor was secured by the security officer.