

Georgia Power Company
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 992-7122



C. K. McCoy
Vice President, Nuclear
Vogtle Project

November 25, 1996

LCV-0793-C

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
REVISED REPLY TO A NOTICE OF VIOLATION

On June 3, 1996, pursuant to 10 CFR 2.201, Georgia Power Company submitted a response to the Nuclear Regulatory Commission (NRC) concerning a violation identified in NRC Inspection Reports 50-424, 425/96-02 for the Unit 1 Pressurizer Safety Valve, 1-PSV-8010C, failing the setpoint verification test. During the Unit 2 fifth maintenance/refueling outage, all three pressurizer safety valves failed the initial setpoint verification testing. Due to these failures, the engineering analysis to determine the possibility of increasing the safety valve setpoint tolerance as described in "Corrective Steps Which Will Be Taken To Avoid Further Violations" will be completed on January 31, 1997, rather than December 1, 1996. This will allow for additional review to address setpoint tolerance.

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

Sincerely,

C.K.M. G
C. K. McCoy

CKM/CIT/AFS

Enclosure: Revised Reply to NOV 50-424;425/ 96-02

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cc: Georgia Power Company

Mr. J. B. Beasley, Jr.

Mr. M. Sheibani

NORMS

U. S. Nuclear Regulatory Commission

Mr. S. D. Ebnetter, Regional Administrator

Mr. L. L. Wheeler, Licensing Project Manager, NRR

Mr. C. L. Ogle, Senior Resident Inspector, Vogtle

ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REVISED REPLY TO A NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424; 425/96-02

VIOLATION B, (50-424;425/96-02-04)

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

- B. 10 CFR 50, Appendix B, Criterion XVI, Corrective Action, requires that measures be taken to preclude repetition of significant conditions adverse to quality.

Contrary to the above, the corrective actions taken in response to the as found lift setpoint of pressurizer code safety relief valve 1-PSV-8010C, being outside of Technical Specification limits were inadequate to preclude repetition. Specifically, the as found lift setpoint was outside technical specification tolerances during all six verification tests conducted between June 1, 1987, and March 14, 1996.

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

REVISED RESPONSE TO VIOLATION B (50-424;425/96-02-04)

Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

Reason for the Violation:

VEGP acknowledges that previous corrective actions to address initial setpoint verifications for pressurizer code safety relief valve 1-PSV-8010C, have not precluded repetition and that this valve has failed its initial setpoint verification each time it was tested. However, prior to the valve being returned to service subsequent to testing and considered to be operating correctly, valve setpoints were verified to be within Technical Specification limits.

It is recognized at VEGP and throughout the industry that setpoint drift is a common problem associated with this type of valve design in this application. Previous corrective actions to address the setpoint problems included minor adjustments to the valve and an evaluation of the potential for a relaxation of the setpoint. Additionally, design modifications to the existing valves and different valve designs were evaluated in an attempt to improve the reliability of pressurizer code safety valves. These evaluations did not reveal any alternatives which would be more reliable or less restrictive than the existing design. VEGP realizes that the above stated corrective actions to address setpoint problems were not sufficient to prevent repetitive failures from occurring for valve 1-PSV-8010C.

Corrective Steps Which Have Been Taken and the Results Achieved:

Due to erratic valve behavior observed during setpoint verification testing performed in the last refueling outage, it was determined that rework of valve 1-PSV-8010C would be required. Upon

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VOGUELE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REVISED REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424; 425/96-02

disassembly, a worn bellows/disc holder assembly was discovered and replaced. This should improve the setpoint characteristics and increase the probability the valve will lift within its allowed tolerance during testing in subsequent refueling outages.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

After determining that the setpoint was outside of TS tolerance during the last refueling outage, an assessment was made of the potential consequences of the as-found setpoint. It was estimated that the safety valve would be capable of performing its safety function at the as-found setpoint. Based on this estimate, an engineering analysis will be performed to determine the possibility of an increase in the setpoint tolerance. Completion date for the engineering analysis is January 31, 1997.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on March 23, 1996, when the valve was repaired and tested in accordance with the Technical Specifications.