

Georgia Power Company
Route 2, Box 299A
Waynesboro, Georgia 30830
Telephone 404 554-9961
404 724-8114

Southern Company Services, Inc.
Post Office Box 2625
Birmingham, Alabama 35202
Telephone 205 870-6011



Vogtle Project

August 21, 1985

Director of Nuclear Reactor Regulation
Attention: Ms. Elinor G. Adensam, Chief
Licensing Branch #4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

File: X7BC35
Log: GN-689

REF: Bailey to Denton, GN-647, Dated 6/25/85

NRC DOCKET NUMBERS 50-424 AND 50-425
CONSTRUCTION PERMIT NUMBERS CPPR-108 AND CPPR-109
VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 AND 2
SER OPEN ITEM 11: LICENSE QUALIFICATIONS

Dear Mr. Denton:

Attached for your staff's review are proposed changes to the FSAR addressing the SER outstanding items as discussed on August 5, 1985. Please note that portions of these changes incorporate changes to the referenced document. It is felt that the referenced document, portions of the referenced document as changed by this attachment, and the additional information contained in this attachment address all of the outstanding items as listed in the SER.

If your staff requires any additional information, please do not hesitate to contact me.

Sincerely,

J. A. Bailey
Project Licensing Manager

JAB/sm
Attachment

xc: D. O. Foster
R. A. Thomas
J. E. Joiner, Esquire
B. W. Churchill, Esquire
M. A. Miller
B. Jones, Esquire (W/o Att.)
L. T. Gucwa

G. Bockhold, Jr
T. Johnson (W/o Att.)
D. C. Teper (W/o Att.)
L. Fowler
W. C. Ramsey
Vogtle Project File

0053V

8508260146 850821
PDR ADOCK 05000424
E PDR

13001
11

Collectively, these members possess the type and degree of expertise required to review unplanned events and proposed changes to systems, procedures, tests, and experiments that affect nuclear safety. The chairman and vice chairman of the PRB are designated by the GMVNO. The minimum quorum of the PRB will consist of the PRB chairman or vice chairman and four members. The PRB meets at least once per calendar month.

The PRB is specifically responsible for the following:

A. Review of:

1. Procedures that establish plantwide administrative controls to implement the quality assurance program or technical specification surveillance program.
2. Procedures for changing plant operating modes.
3. Emergency and abnormal operating procedures.
4. Procedures for effluent releases of radiological consequence.
5. Fuel handling procedures.

B. Review of:

1. Program required by Technical Specifications.

2. Proposed procedures and changes to procedures, equipment, or systems that involve an unreviewed safety question as per 10 CFR 50.59.

- C. Review of proposed changes or modifications to systems or equipment that affect nuclear safety.
- D. Review of proposed tests and experiments that affect nuclear safety.

- E. Review of proposed changes to the Technical Specifications.

- F. ~~Review of the report of the Investigation of~~ ^{including preparation and forwarding of report} violations of the technical specification ~~that~~ covering evaluation and recommendations to prevent recurrence. The report is to be forwarded to the Vice president and general manager Nuclear Operations and to the SRB.

- G. Review of all reportable events.

- H. Review evaluations of plant operations to detect potential nuclear safety hazards.

- I. Performance of special reviews, investigations, or analyses and reports thereon as requested by the GMVNO or the Safety Review Board.

- JX. Review of the Security Plan and implementing procedures and submittal of recommended changes to the GMVNO.
- KJ. Review of the Emergency Plan and implementing procedures and submittal of recommended changes to the GMVNO.
- LX. Review of any accidental, unplanned, or uncontrolled radioactive release in excess of 1 Ci, excluding dissolved and entrained gases and tritium for liquid effluents, and in excess of 150 Ci for noble gases or 0.02 Ci of radioiodines for gaseous effluents.

The PRB's authority is as indicated below:

- A. Recommend in writing to the GMVNO approval or disapproval of items A through D above.
- B. Render determinations in writing with regard to whether or not each item A through E above constitutes an unreviewed safety question.
- C. Provide written notification within 24 h to the vice president and general manager of nuclear operations and the Safety Review Board of the disagreement between the PRB and the GMVNO; however, the GMVNO shall have responsibility for resolution of such disagreements.

The PRB will maintain written minutes of each meeting that, at a minimum, document the results of the PRB activities. Copies of these minutes will be provided for the vice president and general manager-nuclear operations and the safety review board. Further details of the activities and duties of the PRB are described in plant procedures.

VEGP-FSAR-13

13.4.3 INDEPENDENT SAFETY ENGINEERING REVIEWS

An independent safety engineering group (ISEG) will be established prior to initial fuel loading to perform independent reviews of plant operations with emphasis on improving plant safety.

13.4.3.1 Composition

the Senior Vice President-Nuclear
Operations through

The ISEG will be comprised of a minimum of five qualified individuals who will report to the manager-nuclear ~~operations~~ performance and analysis. ~~in the corporate office.~~

13.4.3.2 Qualifications

ISEG members will have a bachelor's degree in engineering or applied science with a minimum of ~~2~~ ¹ year experience in ~~this~~ their field, including at least ~~6 months~~ nuclear experience.

13.4.3.3 Responsibilities

The ISEG will be responsible for:

- A. Review of plant operating characteristics, NRC issuances, industry advisories, and other appropriate sources of plant design and operating experience information that may indicate areas for improving plant safety.
- B. Review of selected plant activities including maintenance modifications, operational problems, and operational analysis, and in the establishment of programmatic requirements for plant activities. The ISEG will develop and present detailed recommendations to the appropriate level of management for improvements such as revisions to procedures and equipment modifications.
- C. Maintaining surveillance of plant operations and maintenance activities to provide independent verification that these activities are performed correctly, and that human errors are reduced as far as practicable.

16

ADMINISTRATIVE PROCEDURE DESCRIPTIONS

Insert 13.5.1.1

A. Procedures for Preparation, Review, and Control of Procedures

These procedures establish the controls for the preparation, review, and control of plant procedures which cover activities as described in Appendix A of Regulatory Guide 1.33, Rev. 2.

Included within these procedures are provisions to ensure that new or revised procedures are reviewed for adequacy by appropriately qualified personnel other than the originator. In accordance with these procedures, a reviewer shall establish knowledge of the applicable requirements for a procedure and shall verify the proper incorporation of these requirements in the procedure; additionally, a reviewer shall assess whether the procedure or procedure revision potentially involves a change in the VEGP Technical Specifications or an unreviewed safety question. ~~To ensure the qualification of reviewers for performing procedure reviews, departmental reviewer qualification checklists shall be used. These checklists shall ensure that reviewers are knowledgeable in the subject area covering the procedures they will review and that they have adequate understanding of the QA Program requirements.~~ The acceptability of procedure reviews is assured by the review and approval of the review by the responsible VEGP Nuclear Operations department heads; the experience and education on an individual basis that qualifies department heads to perform this approval of procedure reviews is delineated in FSAR Table 13.1.2-1 "Resumes of Onsite Supervisory Personnel." Nuclear Operations department heads shall further ensure that procedures described in FSAR Section 13.4.1 are forwarded to the Plant Review Board (PRB) for additional review.

Insert
A

The General Manager - Vogtle Nuclear Operations (GMVNO) has ultimate responsibility for all plant procedures. Provisions of these procedures establish the GMVNO as the approving authority for procedures which establish plant wide administrative controls (which implement the Quality Assurance Program and the Technical Specifications Surveillance Program), for Unit Operating Procedures (UOP's), Emergency Operating Procedures (EOP's), Abnormal Operating Procedures (AOP's), procedures for implementing the Security Plan, the Emergency Plan, and the Fire Protection Program, and Fuel Handling Procedures. Nuclear Operations department heads are established as the approving authority for other procedures covering activities within their area of responsibility.

Additional provisions of these procedures exist to ensure that changes or revisions to procedures are reviewed and approved in accordance with the same administrative controls used for review and approval of new procedures. A provision is made to ensure that plant procedures are reviewed at least every 2 years by a knowledgeable individual to determine whether changes are necessary or desirable. Also provisions exist to ensure that procedures, once approved, are distributed appropriately so that only the most current procedures are used by plant personnel.

Controls for the preparation, review and approval of Initial Test Program Procedures are described in FSAR Section 14.2.2.

Insert A to 13.5.1.1.A

For procedures not forwarded to the PRB, reviewer's will meet requirements of Section 4.4 of ANSI N18.1 - 1971 for applicable disciplines. For those disciplines not described in Section 4.4 of ANSI 18.1 - 1971, the reviewer will have a minimum of 5 years experience. A maximum of 4 years of this 5 years may be fulfilled by related technical or academic training. Reviewers of QC inspection procedures shall meet the requirements of Reg. Guide 1.58 Rev. 1, as described in FSAR Section 1.9.58. Also, those procedures not forwarded to the PRB and impacting another department's area of responsibility, shall be forwarded to the impacted departments for their review.