

NOTICE OF VIOLATION

Georgia Power Company
Vogtle Electric Generating Plant
Units 1 and 2

Docket Nos. 50-424 and 50-425
License Nos. NPF-68 and NPF-81
EA 97-045

During NRC inspections conducted December 22, 1996 through February 1, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

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

RG 1.33, Revision 2, requires that procedures defining authorities and responsibilities for equipment control (e.g., locking and tagging) be established.

Procedure 11888-C, Safety-Related Locked Valve Manipulation, Revision 8, requires that a Log Sheet be prepared for valve manipulation and includes independent verification. Procedure 11867-2, Safety-Related Locked Valve Verification Checklist, Revision 20, establishes the responsibilities of Operations Department personnel to ensure proper control of valve manipulations.

Procedures 11429-1, Revision 11, and 11429-2, Revision 7, 480-Volt AC 1E Electrical Distribution System Alignments, require that all breakers be in specified required positions and verified.

Contrary to the above, the licensee failed to implement the written procedures as evidenced by the following examples:

- (1) Operations personnel failed to perform adequate independent verification required by Procedure 11888-C in that valve 2-2403-U4-765, the Unit 2 DG A Air Start Receiver number 1 discharge isolation valve, was not in its proper configuration. Specifically, on December 30, 1996, during a routine tour, the inspectors observed that the valve was open with a chain and unlocked padlock attached. Procedure 11867-2 requires this valve to be locked open.
- (2) Operations personnel failed to implement Procedures 11429-1 and 11429-2 in that breakers were improperly positioned. Specifically, on January 19, 1997, the inspectors conducted a walkdown of the 480-Volt breakers on motor control centers (MCCs) 1BBE and 2BBE and noted that fifteen breakers were not in the specified position and verified. (01014)

This is a Severity Level IV violation (Supplement I).

Enclosure 1

- B. Technical Specification (TS) 3.8.4.2, Safety-Related Motor-Operated Valves Thermal Overload Protection and Bypass Devices, requires that the thermal overload protection bypass device of valve 1-HV-8802A, Safety Injection Pump A to Hot Leg 1 & 4 Isolation Valve to be operable whenever the valve is required to be operable.

The TS 3.8.4.2 Limiting Condition For Operations (LCO) action statement requires the valve to be declared inoperable and the appropriate action statement entered when the thermal overload protection bypass device is inoperable.

TS 3.5.2, Emergency Core Cooling System (ECCS) - T_{ave} Greater Than Or Equal To 350°F, requires two independent ECCS subsystems with each subsystem comprised of an operable flow path. Valve 1-HV-8802A is part of the hot leg injection flow path for safety injection pump 1A into RCS loops 1 & 4.

TS Action Statement 3.5.2.a requires that with one of these flow paths inoperable, the inoperable flowpath be restored to an operable status within 72 hours or be in Hot Standby within the next six hours and in Hot Shutdown within the following 6 hours.

Contrary to the above, between March 28, 1996 and January 9, 1997, when Unit 1 was operated in modes 1, 2, and 3, the licensee failed to maintain two independent ECCS flow paths operable in that the thermal overload protection bypass device was improperly wired and hence valve 1-HV-8802A was inoperable. Additionally, the provisions of TS Action Statement 3.5.2.a were not met. (02014)

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Georgia Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, Vogtle, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Atlanta, Georgia
this 25th day of March 1997

LIST OF ATTENDEES

Nuclear Regulatory Commission

L. Reyes, Regional Administrator, Region II (RII)
J. Johnson, Director, Division of Reactor Projects (DRP), RII
B. Uryc, Director, Enforcement and Investigations Coordination Staff (EICS),
RII
P. Skinner, Chief, Reactor Projects Branch 2, DRP, RII
L. Wheeler, Senior Project Manager, Office of Nuclear Reactor Regulation (NRR)
C. Evans, Regional Counsel, RII
C. Ogle, Senior Resident Inspector, Plant Vogtle, DRP, RII
A. Boland, Enforcement Specialist, EICS, RII
R. Carrion, Project Engineer, Reactor Projects Branch 2, DRP, RII
R. Pederson, Enforcement Coordinator, Office of Enforcement*

*Participated by Telephone

Georgia Power Company (GPC)

J. Woodard, Senior Vice President
C. McCoy, Vice President - Vogtle Project
B. Beasley, General Manager, Vogtle Project
J. Bailey, Licensing Manager
K. Holmes, Manager of Maintenance
M. Slivka, Independent Safety Evaluation Group Supervisor
S. Chestnut, Manager of Operations
J. Hanyok, Electrician
S. Whitman, Plant Equipment Operator
T. Harris, Reactor Operator
M. Frazier, Jr., Electrician

NRC SLIDES

PREDECISIONAL ENFORCEMENT CONFERENCE AGENDA

VOGTLE

MARCH 10, 1997, AT 10:30 A.M.

NRC REGION II OFFICE, ATLANTA, GEORGIA

- I. OPENING REMARKS AND INTRODUCTIONS
L. Reyes, Regional Administrator
- II. NRC ENFORCEMENT POLICY
B. Uryc, Director
Enforcement and Investigation Coordination Staff
- III. SUMMARY OF THE ISSUES
L. Reyes, Regional Administrator
- IV. STATEMENT OF CONCERNS / APPARENT VIOLATION
J. Johnson, Director, Division of Reactor Projects
- V. LICENSEE PRESENTATION
- VI. BREAK / NRC CAUCUS
- VII. NRC FOLLOWUP QUESTIONS
- VIII. CLOSING REMARKS
L. Reyes, Regional Administrator

APPARENT VIOLATIONS

- A. Technical Specification 6.7.1.a required that written procedures be established and implemented for the activities identified in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978.

RG 1.33, Revision 2, requires that procedures defining authorities and responsibilities for equipment control (e.g., locking and tagging) be established.

1. Procedure 11888-C, Safety-Related Locked Valve Manipulation, Revision 8, requires that a Log Sheet be prepared for valve manipulation and includes independent verification. Procedure 11867-2, Safety-Related Locked Valve Verification Checklist, Revision 20, establishes the responsibilities of Operations Department personnel to ensure proper control of valve manipulations.

Operations personnel failed to perform adequate independent verification required by Procedure 11888-C in that valve 2-2403-U4-765, the Unit 2 DG A Air Start Receiver number 1 discharge isolation valve, was not in its proper configuration. Specifically, on December 30, 1996, during a routine tour, the inspectors observed that the valve was open with a chain and unlocked padlock attached. Procedure 11867-2 requires this valve to be locked open.

2. Procedures 11429-1, Revision 11, and 11429-2, Revision 7, 480-Volt AC 1E Electrical Distribution System Alignments, require that all breakers be in specified required positions and verified.

Operations personnel failed to implement Procedures 11429-1 and 11429-2 in that breakers were improperly positioned. Specifically, on January 19, 1997, the inspectors conducted a walkdown of the 480-Volt breakers on motor control centers (MCCs) 1BBE and 2BBE and noted that fifteen breakers were not in the specified position and verified.

NOTE: THE APPARENT VIOLATION DISCUSSED IN THIS PREDECISIONAL ENFORCEMENT CONFERENCE IS SUBJECT TO FURTHER REVIEW AND IS SUBJECT TO CHANGE PRIOR TO ANY RESULTING ENFORCEMENT DECISION.

APPARENT VIOLATIONS (CONTINUED)

- B. Technical Specification (TS) 3.8.4.2, Safety-Related Motor-Operated Valves Thermal Overload Protection and Bypass Devices, required that the thermal overload protection bypass device of valve 1-HV-8802A, Safety Injection Pump A to Hot Leg 1 & 4 Isolation Valve, be operable whenever the valve is required to be operable.

The TS 3.8.4.2 Limiting Condition For Operations (LCO) action statement required the valve be declared inoperable and the appropriate action statement entered when the thermal overload protection bypass device was inoperable.

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TS Action Statement 3.5.2.a requires that with one of these flow paths inoperable, the inoperable flowpath be restored to an operable status within 72 hours or be in Hot Standby within the next six hours and in Hot Shutdown within the following 6 hours.

Between March 28, 1996 and January 9, 1997, when Unit 1 was operated in modes 1, 2, and 3, the licensee failed to maintain two independent ECCS flow paths operable in that the thermal overload protection bypass device was improperly wired and hence valve 1-HV-8802A was inoperable. Additionally, the provisions of TS Action Statement 3.5.2.a were not met.

NOTE: THE APPARENT VIOLATION DISCUSSED IN THIS PREDECISIONAL ENFORCEMENT CONFERENCE IS SUBJECT TO FURTHER REVIEW AND IS SUBJECT TO CHANGE PRIOR TO ANY RESULTING ENFORCEMENT DECISION.

PREDECISIONAL ENFORCEMENT CONFERENCE

CONFIGURATION CONTROL ISSUES

MARCH 10, 1997

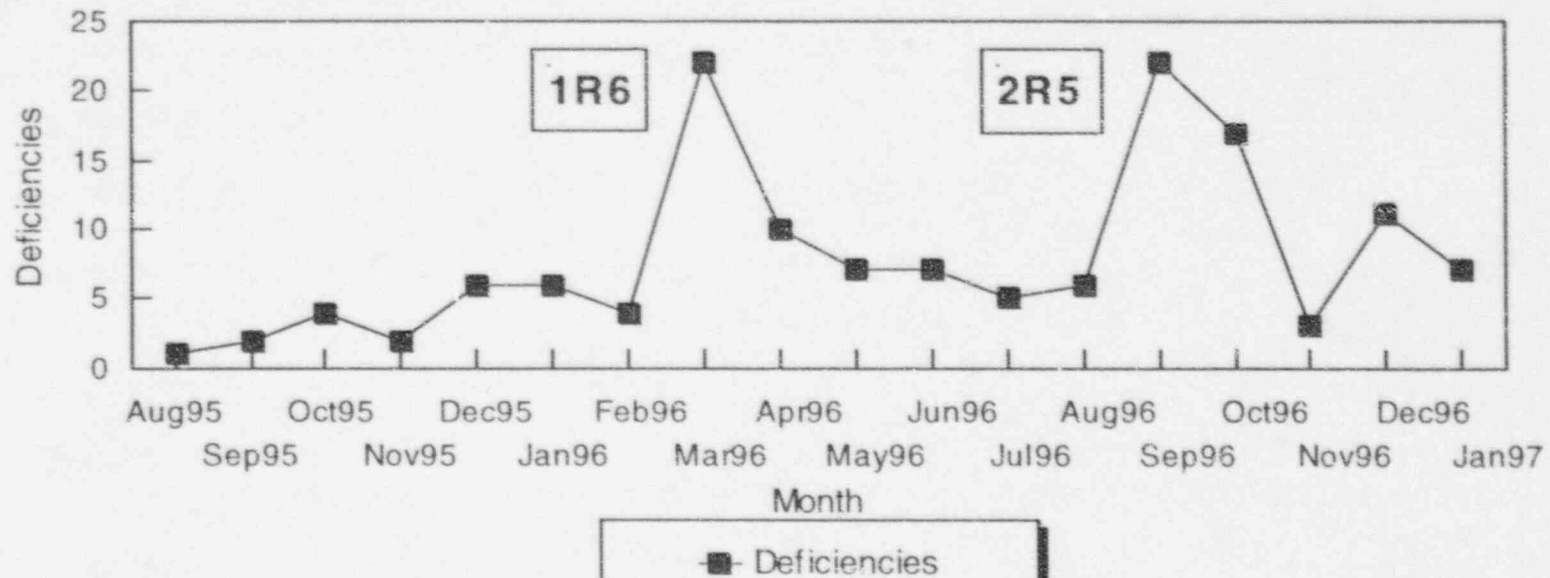
- **OPENING REMARKS**
GPC/NRC
KEN McCOY
- **DESCRIPTION OF PROBLEM**
BARNIE BEASLEY
- **CAUSES**
BARNIE BEASLEY
- **CORRECTIVE ACTIONS**
BARNIE BEASLEY
STEVE CHESNUT
KEN HOLMES
- **CLOSING REMARKS**
GPC/NRC
KEN McCOY

DESCRIPTION OF PROBLEM

During this review, 142 deficiencies were selected in order to establish the number of deficiencies and a base of information possibly related to configuration control issues. This was performed to clearly understand where the problems were occurring and the broadness of the issue.

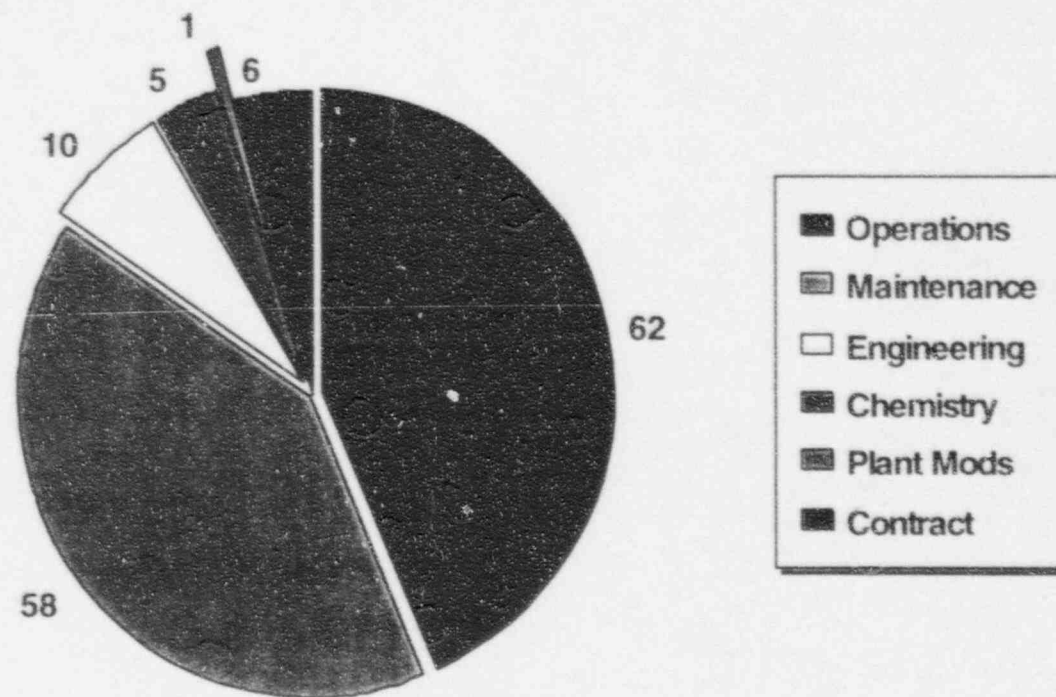
Configuration Deficiencies by Month

August 1995 to January 1997

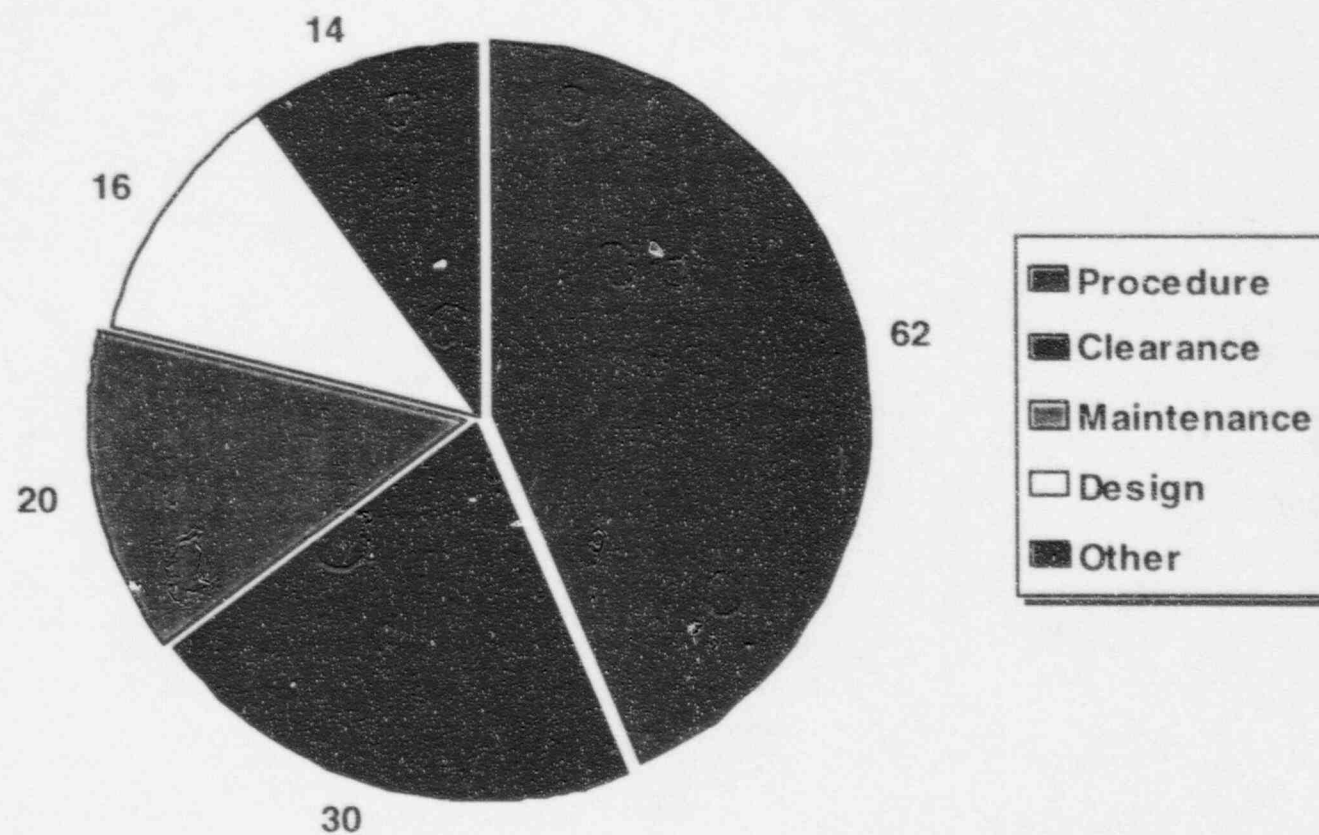


Configuration Deficiencies by Department

August 1995 to January 1997



Configuration Deficiencies by Task



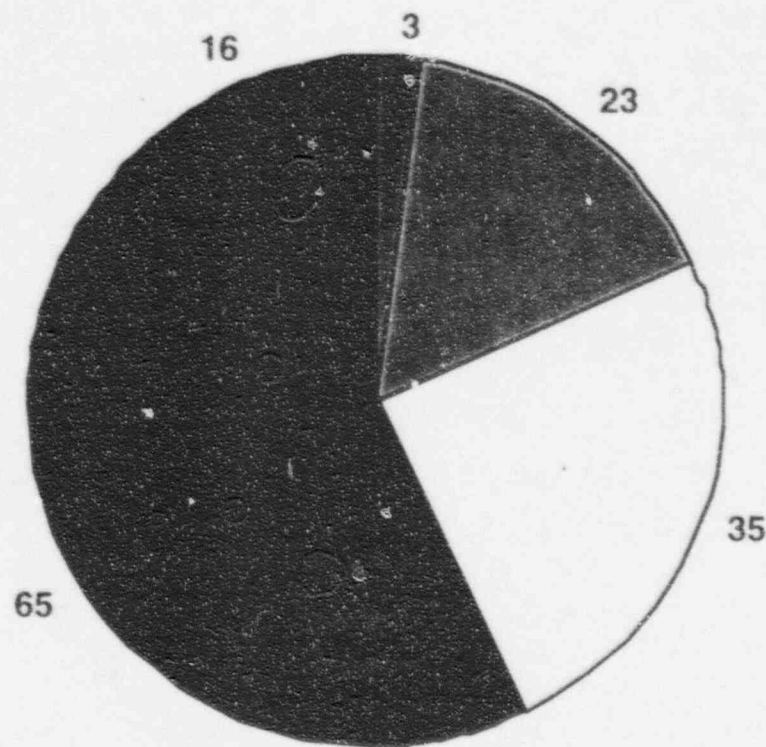
DESCRIPTION OF PROBLEM






The 142 deficiencies identified were categorized into 5 areas depending on the significance of each deficiency. This review enabled management to clearly understand the significance of each deficiency. The 5 categories and number of deficiencies are as follows:

1. Nuclear Safety	3
2. Radiological/Personnel Safety	23
3. Regulatory/Procedure Compliance	35
4. Plant Efficiency and Reliability	65
5. Other Minor Deficiencies	16

Significance of the Configuration Deficiencies

August 1995 to January 1997



-  Nuclear Safety
-  Rad/Pers. Safety
-  Reg/Proc. Compliance
-  Reliability
-  Other Minor Deficiencies

DESCRIPTION OF PROBLEM

Nuclear Safety

- 1. 1HV-8802A, Safety Injection Pump hot leg isolation valve thermal overload bypass jumper was landed incorrectly.**
- 2. While in Mode 1, Residual Heat Removal cold leg isolation and Safety Injection hot leg isolation valves were momentarily stroked numerous times to test the motor operator valve sensor.**
- 3. Safety Injection Pump 1B motor cooler configuration issues.**

DESCRIPTION OF PROBLEM

Radiological/Personnel Safety

- 1. Clearance released before completion of work on computer room AC unit.**
- 2. While flushing the Positive Displacement Pump to equalize boron concentration prior to operation, the room drains backed up causing spread of contamination.**

DESCRIPTION OF PROBLEM

Regulatory/Procedure Compliance

- 1. Valve 1HV-8220, Post Accident Sampling System valve was out of position.**
- 2. Spent Fuel Rack dummy assembly was placed in an incorrect location.**

DESCRIPTION OF PROBLEM

Plant Efficiency and Reliability

- 1. Incorrect O-Rings were used on two Borg-Warner valves.**
- 2. Motor Control Center breaker thermal overload heater coil was not installed in accordance with the breaker data sheet.**

DESCRIPTION OF PROBLEM

Other Minor Deficiencies

- 1. The cover for a relay in the 2B Diesel Generator control cabinet was not installed after maintenance/testing.**
- 2. Elementary drawing does not reflect field configuration. This is an example in which the field configuration was correct but the design change package did not revise all applicable drawings.**

CAUSES

Root Causes

- **Attitude**
- **Management focus and follow-up.**
- **Repeat occurrences are not being identified in the corrective action process, thereby allowing potential trends to go unnoticed.**

CAUSES

Contributing Factors

- **VEGP lowered the threshold for identification/reporting problems.**
- **In 1996, two refueling outages were performed. Outages present more opportunities for erroneous component manipulations.**

Human Performance History

- **Major Problems List Item**
- **STAR (Stop-Think-Act-Review)**
- **Near Misses**
- **INPO Evaluations**
- **Visited other facilities**
- **Root Cause training**
- **Management discussions regarding human performance/complacency**
- **Maintenance Flow Loop Simulator**

CORRECTIVE ACTIONS

General

- **Management Review Team formed to review configuration control.**
- **Strengthened the Pre-Job Briefings procedure with a revision to require briefings prior to each task.**
- **The three key procedures utilized for Independent Verification (IV) have been revised to strengthen IV process.**

CORRECTIVE ACTIONS

General

- **Performance of internal assessments by departments.**
- **In-depth RCCAs will be required for significant issues related to configuration control.**
- **Better methods for deficiency tracking and trending are being put in place to improve our capabilities.**

CORRECTIVE ACTIONS

Operations

- **The components that were identified to be mispositioned or not properly secured were corrected.**
- **System alignments have been completed on safety related systems to ensure our existing configuration and lineups are accurate. Additional special lineup verifications will be scheduled to ensure configuration is maintained.**
- **Operators and supervisors received specific training on expectations and techniques for assuring accurate configuration. Training was led by Operations management and supervision and was conducted in small groups to ensure each person's understanding and commitment.**

CORRECTIVE ACTIONS

Operations

- **Procedure 00304-C “Equipment Clearance and Tagging” was revised to provide additional guidance to assure independence on clearance restoration.**
- **Administrative Controls for tracking out of position valves and components have been strengthened.**

CORRECTIVE ACTIONS

Maintenance

- **The components that were identified to be mispositioned were corrected.**
- **A verification of equipment restoration was performed for some work orders to ensure field conditions and documentation were correct. Approximately 750 points were verified.**
- **Procedure 20429-C, "Short Term Documentation of Temporary Jumpers and Lifted Wires" has been revised.**

CORRECTIVE ACTIONS

Maintenance

- **Department supervision has received training by the department management on performance expectations for two party verifications.**
- **Each crew leader has conducted training on expectations and the revised procedure 20429-C, for his crew. Management participated in this training.**
- **A verification of 10 modification installations was conducted. Identified problems have been or are in the process of being corrected.**

CORRECTIVE ACTIONS

Chemistry

- **System/valve alignment verifications have been performed for Nuclear Steam Supply System sampling system and Plant Effluent Radiation Monitoring System.**
- **Procedure 35515-C, "Operation of the Nuclear Sampling System-Liquid" has been revised.**
- **The Chemistry Superintendent has conducted training for Chemistry personnel to discuss performance expectations on configuration control, procedure compliance and the requirement to perform tasks correctly, especially independent verifications.**

CORRECTIVE ACTIONS

Engineering Support

- **Personnel were trained by department management on configuration control issues relating to engineering work activities.**
- **It was stressed to personnel to be aware of component configuration and to maintain a questioning attitude during system walkdowns.**