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the southern electric system

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United States Nuclear Regulatory Commission
Region II
Suite 2900
101 Marietta Street, Northwest
Atlanta, Georgia 30323

File: X7BG10
Log: GN-743

Reference: 50-424/85-43, 50-425/85-32

Attention: Mr. Roger D. Walker

The Georgia Power Company wishes to submit the following information concerning the violation identified in NRC inspection report 50-424/85-43 and 50-425/85-32:

Violation 50-424/85-43-01, 50-425/85-32-01; "Failure to Provide Adequate Protection to Safety-Related Components During In-Plant Storage" - Severity Level IV

The violation identified five valves and one electrical panel which were not adequately protected from damage or contamination in accordance with established procedures. Georgia Power Company offers the following response pursuant to the criteria of 10 CFR 2.201:

1. Georgia Power Company acknowledges the violation as identified in the NRC inspection report. As a point of clarification, the identification numbers given in the NRC inspection report for the four Unit 2 control valves located on Level C of the Unit 2 Containment are in error. The correct identification numbers for these valves, in the order listed in section 15.b of the inspection report, are 2HV-15212B, 2HV-15212C, 2HV-15216B, and 2HV-15216C.

2. Georgia Power Company has developed and implemented an equipment storage and maintenance program at the Vogtle Electric Generating Plant which meets the applicable requirements of ANSI N45.2.2 - 1972. This program prescribes specific requirements for the protection of stored equipment from damage or deterioration and provides periodic preventive maintenance and routine surveillances to provide reasonable assurance that the program requirements are met. However, considering the amount of equipment controlled in the storage and maintenance program and the amount of construction and testing activity in and around in-plant storage areas, it is expected that occasional discrepancies in program implementation will occur. Identified discrepancies are documented, evaluated, and resolved as required to ensure that affected equipment will satisfactorily perform its design functions.

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A review of the discrepancies cited in the violation involving four valves in the Unit 2 Containment indicates that no sandblasting operations were performed in the area but that the grit on exterior valve surfaces was the result of a "dust blowdown" performed in the area during the weekend of August 31, 1985. Building "dust blowdown" is a controlled activity which includes a walkdown prior to blowdown operations to ensure that equipment in the area is protected as required from dust contamination. Blowdown operations were not scheduled to be performed in the Unit 2 Containment on the weekend of August 31, 1985, so the walkdown was not performed for equipment in that area. However, blowdown crews working near the Unit 2 Containment, with conscientious intentions, expanded the scheduled assignments by performing a "dust blowdown" in the Unit 2 Containment since the manpower and equipment were already in the general area. As a result, dust and grit was blown onto the four valves which were stored in the area without the protective covering normally provided during blowdown operations.

In the case of the Refueling Water Storage Tank Suction Inlet Valve to the Residual Heat Removal System (Valve No. HV 8812A), the bonnet and gate of the valve was removed for hydrolazing of the associated piping as part of the system flushing program. The bonnet and gate were carefully wrapped and protected upon removal while hydrolazing activities continued for approximately one month. A Construction Department Deviation Report, PP-11723, had identified a needed seal lip repair on the valve. Apparently, in the course of various examinations of the valve for the pending work to resolve the Deviation Report, the valve was left uncovered for a brief period. From an evaluation of this discrepancy by the Nuclear Operations Department, it is estimated that the valve was uncovered for about thirty-six hours.

Train "A" Remote Shutdown Panel 1-1605-P5-SDA has been turned over by Construction to Nuclear Operations and has been entered into the Preoperational Maintenance Program governed by Startup Manual procedure SUM-25. Much work is being conducted in and around the remote shutdown panels. An evaluation of this discrepancy by Nuclear Operations was unable to determine the cause of the door being open at the time of the NRC inspection but it is apparently the result of heavy work traffic in the area.

3. The four valves stored in the Unit 2 Containment were cleaned and securely wrapped on September 9, 1985. All electrical enclosure connections were also cleaned, capped, and taped. The bent bracket on valve 2HV-15216C was identified in Deviation Report ID-1437 to ensure proper evaluation and resolution. A followup inspection on November 6, 1985, verified that the cleanliness and protection of the valves was being maintained.

   Valve HV-8812A and Remote Shutdown Panel 1-1605-P5-SDA were examined and no evidence was found of damage or deterioration as a result of the cited discrepancies. Valve HV-8812A was promptly covered

after the discrepancy was identified and the door to the Remote Shutdown Panel was closed. Disassembled valves under Nuclear Operations control are rarely stored in the plant. Plant procedures require that disassembled valves be cleaned, identified, wrapped or covered, and properly stored to prevent damage or deterioration. Valve parts are usually stored in the Operations Warehouse until reassembly unless their physical size or weight makes this impractical. In evaluating the violation, Nuclear Operations attempted to conduct a review of other valves which were disassembled for flushing purposes but no other disassembled valves were stored in the plant at that time.

Since September 30, 1985, the remote shutdown panels have been added to a maintenance surveillance list which provides a check of the panels each shift. The panel doors have been found open on other occasions since the violation was identified. The maintenance surveillance check includes verification of area cleanliness, air filter cleanliness, door closure, and work in progress in the area.

4. To prevent further violations regarding the protection of stored equipment under Construction Department control, Georgia Power Company and Pullman Power Products, the piping contractor, have assigned personnel to monitor field storage conditions for valves and other equipment during each shift to ensure that covers and other protective methods are properly maintained. Additional controls have also been established for "dust blowdown" operations to ensure that prerequisite walkdowns are accomplished.

   Relative to equipment controlled by Nuclear Operations, the relatively short durations of the cited discrepancies indicate that the Preoperational Maintenance Program is reasonably effective in protecting equipment from damage and deterioration and no action to prevent recurrence is necessary. It should be noted that safety-related equipment will be thoroughly tested before being placed into service.

5. All corrective actions relative to this violation have been completed.

This response contains no proprietary information and may be placed in the NRC Public Document Room.

Yours truly,

D. O. Foster

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