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J. H. Miller, Jr.
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the southern electric system

NED-85-875
2351N

December 2, 1985

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
101 Marietta Street, NW
Atlanta, Georgia 30323

REFERENCE:
RII: JNG
Inspection Reports
50-321-50-366 (85-21)
50-424-50-425 (85-27)

ATTENTION: Dr. J. Nelson Grace

Gentlemen:

By letter dated October 23, 1985, the Nuclear Regulatory Commission (NRC) transmitted the Systematic Assessment of Licensee Performance (SALP) report for Plant Hatch and Plant Vogtle and requested comments from the Georgia Power Company (GPC). The SALP assessment covered a period of twenty months from November 1, 1983 through June 30, 1985. On November 4, 1985, a public meeting between the NRC and GPC was held to discuss the details of this important report.

GPC recognizes and appreciates the observations made in your report regarding the performance of Plant Hatch and Plant Vogtle. GPC believes that such evaluations of licensee performance benefit GPC and the public by focusing attention on matters important to plant safety. GPC is committed to the safe operation and construction of its nuclear facilities. Accordingly, we intend to be fully responsive to the observations discussed in your report.

Enclosed are GPC's responses to the evaluations. Enclosure 1 addresses Plant Hatch and Enclosure 2 addresses Plant Vogtle. In our response for Plant Hatch, we identify a disagreement with your evaluation of Category 3 in the functional area of Maintenance. We request that you reconsider this specific evaluation based on our comments and the volume of activities that took place during the twenty month evaluation period. We believe a Category 2 evaluation is justified. Notwithstanding, our corrective action to further improve our maintenance program is proceeding on a high priority basis.

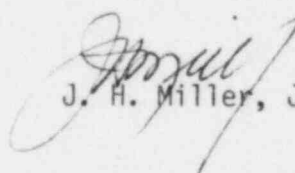
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We would be pleased to discuss this response or answer questions you may have.

Yours very truly,


J. H. Miller, Jr.

DMC/mb

Enclosure 1 Comments on SALP Report for Plant Hatch
Enclosure 2 Comments on SALP Report for Plant Vogtle

c: Mr. R. E. Conway
 Mr. J. T. Beckham, Jr.
 Mr. D. O. Foster
 Mr. G. Bockhold, Jr.
 Mr. H. C. Nix, Jr.
 Senior Resident Inspector (Hatch)
 Senior Resident Inspector (Vogtle)

ENCLOSURE 1

COMMENTS ON SALP REPORT FOR PLANT HATCH

INTRODUCTION

Georgia Power Company (GPC) has concluded that the ratings presented in the SALP report for Plant Hatch reflect the Plant's level of performance, except in the functional area of Maintenance. GPC has carefully reviewed the SALP report and has several comments on each of the functional areas. Special attention has been directed to the functional areas of Maintenance and Training.

OPERATIONS

Our performance was evaluated as a Category 2 (Management attention and involvement are evident and resources are adequate). We are pleased that the NRC recognized an improvement in this period. GPC has been and is devoting management attention to this most important area. Specifically, GPC has substantially increased its corporate office nuclear staff, applied additional resources to procedural development, and placed plant emphasis on improving procedural compliance by both operations and maintenance personnel.

RADIOLOGICAL CONTROLS

Our performance was evaluated as Category 1 (Management attention and involvement are aggressive and oriented toward nuclear safety and resources are effectively used). GPC is very sensitive to the need to protect our employees, as well as the public, from unnecessary radiation exposure. In this regard, we are proud of the NRC's evaluation. Our company will continue to apply the necessary resources to further improve Radiological Controls.

MAINTENANCE

Our performance was evaluated as Category 3 (Licensee management attention or involvement is acceptable and considers nuclear safety, but weaknesses are evident). In our view, the NRC rating reflects a disproportionate reliance on a number of relatively minor violations. Plant Hatch's maintenance program has improved significantly because of actions which were under development and partially implemented during the SALP period. Thus, GPC requests reconsideration of the Category 3 evaluation.

We believe that it is important to recognize that during this evaluation period, Plant Hatch scheduled and successfully managed one of the most extensive and difficult maintenance efforts ever implemented at the Plant. It was, in our view, one of the more difficult periods relative to other nuclear power plants. At times the Plant undertook an

ENCLOSURE 1 (Continued)

COMMENTS ON SALP REPORT FOR PLANT HATCH

appearance that resembled initial construction-like efforts, (e.g., those activities associated with recirculation pipe replacement and repairs, torus modifications and replacement of electrical equipment). In spite of such expanded maintenance activities, maintenance performance improved and only minor deficiencies were identified by the NRC. Our evaluation of the overall situation leads us to conclude that a fair evaluation is Category 2. Notwithstanding our view of the NRC evaluation, the following actions are being taken:

1. As discussed with your staff, GPC will schedule quarterly meetings with NRC Region II to include the detailed status of our maintenance activities. We believe this type of meeting will enhance communications and improve performance.
2. As discussed in the SALP meeting, GPC will, in the near future, complete its staffing in the Maintenance and Outage Planning Areas in the General Office. We believe this level of additional professional support to our plants will substantially enhance performance.
3. GPC will continue to address the following items:
 - a. Adherence to procedures/Attention to detail:
 - (1) Procedure upgrade program is in progress to improve the quality of the procedures. This will be a major ongoing effort with expected completion by the end of 1987.
 - (2) Efforts to achieve Accreditation are in progress for maintenance with both current specific equipment and certification training to begin in the second quarter of 1986.
 - (3) Increased involvement of supervisory personnel was accomplished during the course of the SALP review period by adding six maintenance foremen, three I&C foremen and one maintenance supervisor.
 - b. Proper assignment of functional testing following maintenance:
 - (1) A Work Planning Group was established during the SALP review period to ensure that functional testing will be adequately performed following maintenance.

ENCLOSURE 1 (Continued)

COMMENTS ON SALP REPORT FOR PLANT HATCH

- (2) As the maintenance procedures are upgraded, required functional tests will be more clearly identified and formally documented procedurally. These actions will further assure that required functional tests are properly conducted.
- c. Proper identification of "root causes":
 - (1) There continues to be increased emphasis on root cause determination by site personnel with increasing corporate support. Maintenance engineering currently reviews plant equipment maintenance work orders (MWO's) and provides trending of problem areas for management review and follow-up.
 - (2) A corporate maintenance group, already recruited, will review significant or recurring corrective maintenance activities and will provide strong site support.
 - (3) A computerized MWO tracking system is currently in place. It is the primary tool for supporting these trending and "root cause" efforts.
- d. Quality control involvement and QC functions for major jobs will be conducted by GPC as a general rule. When QC must be contracted out for specific activities, site QC will be more directly involved in the control of these activities.

SURVEILLANCE

Our performance was evaluated as Category 2. GPC agrees with the NRC's evaluation of the Plant Hatch surveillance program. In order to ensure that the surveillance program continues to be an effective one and that further improvements are made, GPC has initiated a Technical Specification surveillance review, devoting increased Company and consultant resources to improve Plant Hatch's surveillance program.

FIRE PROTECTION

Our performance was evaluated as Category 2. Plant Hatch has continued to demonstrate improved performance in the fire protection functional area. Special measures have been taken to improve surveillance, training, and maintenance. As the final Appendix R retrofits are completed, the fire protection performance should show further improvements.

ENCLOSURE 1 (Continued)

COMMENTS ON SALP REPORT FOR PLANT HATCH

EMERGENCY PREPAREDNESS

Our performance was evaluated as Category 2. GPC agrees with the NRC's evaluation. Additional training has been conducted for operations supervisors and other key emergency planning positions. Additional training and drills will be conducted to ensure that Emergency Preparedness is maintained at high standards. GPC sincerely believes that emergency planning and preparedness is an important part of our defense-in-depth philosophy relative to public safety and commits to achieving improvements.

SECURITY

Our performance was evaluated as Category 2. GPC agrees that a Category 2 evaluation is appropriate. We are disturbed with the NRC's reported declining trend. Improvements will be implemented to attain better performance such as state-of-the-art equipment, reviews of the organization and staffing levels, and reconsideration of modification to our security building.

REFUELING/OUTAGES

Our performance was evaluated as Category 2. Again, GPC notes that during this SALP period, Hatch experienced two major outages, including a 7-1/2 month outage to replace Unit 2 recirculation piping. In addition, major improvements and retrofits were implemented without significant events. We have added to our site maintenance and outage staffs and are creating a new corporate Maintenance and Outage Planning Group to improve the refueling and outage programs further. The Hatch ALARA record and the satisfactory performance of major outage activities are results of improvements already implemented.

TRAINING

Our performance was evaluated as Category 3. GPC recognizes that its operator requalification program experienced programmatic deficiencies and has attached the highest priority to that program's improvement. We are pleased that you recognize the upward trend in our training performance and acknowledge the NRC staff efforts to work closely with us. We have every expectation that the next SALP report will reflect the results of our program improvements.

These improvements are:

1. Special instruction has been provided to assist our students in the development of improved study habits and test-taking methods.
2. One-on-one tutoring has been and will be continuously available on student request and as deemed necessary by training management.

ENCLOSURE 1 (Continued)

COMMENTS ON SALP REPORT FOR PLANT HATCH

3. The Plant Hatch training staff has increased and the corporate training staff has doubled.
4. GPC is aggressively pursuing accreditation of its training programs by the Institute of Nuclear Power Operations (INPO) with the following actions:
 - a. Seven of ten program self-evaluations have been submitted, and an accreditation team visit is scheduled for early 1986.
 - b. All training programs are being converted to performance-based programs and a multi-million dollar training program development contract has been signed to help the prompt improvement and development of training programs at Plant Hatch.
 - c. GPC is upgrading the instructor training programs to improve the caliber of classroom and practical instruction. An instructor upgrade program has been initiated to improve the communication, technical, and development skills of Hatch instructors.
 - d. A quality on-the-job training program for Maintenance personnel is being developed and near completion.
5. Other significant training initiatives being implemented, include:
 - a. The Hatch operator performance standards have been upgraded. Observations already indicate a more professional control room performance. Operators who could not meet the upgraded standards have been reassigned.
 - b. While some of the senior operators already have college degrees, GPC is implementing degree-programs for those operators who do not have a technical degree.
 - c. The emergency operating procedures have been reviewed, with a training perspective, to avoid unnecessary memorization or inappropriate immediate operator actions.
6. A new requalification program has been submitted to the NRC for review. GPC has already seen tangible returns from the upgraded program in the performance of operators. The higher standards are being strictly applied as reassignments of several experienced operators have already taken place.

ENCLOSURE 1 (Continued)

COMMENTS ON SALP REPORT FOR PLANT HATCH

7. Other training improvements have been implemented. These are:
 - a. A formal eleven week training program for support engineers has been recently implemented. This program should enhance overall plant knowledge.
 - b. Deficiencies in emergency planning training for operations supervisors have been corrected by additional training. This matter will be monitored during drills and exercises. Future performance-based training will focus on deficiencies.

It is unfortunate that, while the SALP report covered a twenty month period, the period was terminated two weeks before initiation of engineering training and the completion of our requalification upgrade program. Considering the strides made in training at Plant Hatch in 1985, it is disappointing that the report grade did not recognize the progress in the same manner as the report narrative. GPC will continue our efforts into the future.

QUALITY PROGRAMS AND ADMINISTRATIVE CONTROLS AFFECTING QUALITY

Our performance was evaluated as Category 2. GPC agrees with the basic components of the evaluation. However, we believe that our program performance is improving. Some of the major improvements initiated during this rating period include: a comprehensive zero based audit matrix system; increased use of work in progress and contractor surveillances; and revised, expanded, radiological controls monitoring procedures. We believe we have a large and aggressive QA staff which has been charged with responsibility to continue aggressive program implementation and the use of the newly developed zero-based audit matrix system. We intend to look more at work-in-progress, to place greater emphasis on the use of technical specialists in key audit program activities, and to review a broad range of other programs to ensure that quality is built-in and maintained.

LICENSING ACTIVITIES

Our performance was evaluated as Category 2. GPC has expanded its licensing staff. This will result in GPC being more active in planning future HNP licensing activities, in industry-wide licensing activities, and in identifying and clarifying license commitments. GPC recognizes past concerns over timeliness, and has taken action to correct this problem, such as implementing a computerized tracking system, and by upgrading its commitment management system.

ENCLOSURE 1 (Continued)

COMMENTS ON SALP REPORT FOR PLANT HATCH

GPC is working to have a competent, forward looking, and receptive licensing organization. Recent organizational changes will result in a more assertive licensing approach. We believe that company-generated initiatives have and will result in improvements. We fully expect to have those improvements visibly manifest themselves to NRC in the future and that these improvements will be reflected in the next SALP rating.

CONCLUSION

We feel this SALP evaluation was representative of the Plant's performance except in the area of maintenance. GPC is committed to further enhance all our programs. We are taking appropriate action to address their concerns and plan to keep you informed during our quarterly meetings.

ENCLOSURE 2

COMMENTS ON SALP REPORT FOR PLANT VOGTLE

INTRODUCTION

Georgia Power Company has reviewed the SALP Report for Plant Vogtle and endorses the observation regarding Plant Vogtle's performance. We feel the report accurately and effectively appraised Plant Vogtle's performance. We agree with the overall evaluation:

"The licensee continues to implement a vigorous construction project management effort with well qualified and experienced personnel. Licensee programs have been effective in the identification and resolution of problems. Major strengths have been identified in areas of Soils and Foundations, Safety-Related Components - Mechanical, and Quality Programs and Administrative Controls Affecting Quality. No major weaknesses were identified."

Even though no major weaknesses were identified, GPC intends to further enhance our programs by making the following improvements.

EXCAVATION AND BACKFILL

Our performance was evaluated as Category 1 (Management attention and involvement are aggressive and oriented toward nuclear safety and resources are effectively used). We are committed to continue to devote the same level of management attention and resources to this area to ensure the high level of performance is continued.

CONTAINMENT, SAFETY-RELATED STRUCTURES AND MAJOR STEEL SUPPORTS

Our performance was evaluated as Category 2, with an improving trend (Management attention and involvement are evident and resources are adequate). GPC recognizes the importance of welding activities and continues to enhance our program. We have improved our visual weld acceptance criteria and increased our QA and QC overview of welding activities.

PIPING SYSTEMS AND SUPPORTS

Our performance was evaluated as Category 2. We are further strengthening our programs in this area. We have implemented the following programs to further enhance our performance:

1. Pre-engineering walkdowns to assure the craft has the necessary information to do the job right the first time.
2. A foreman accountability program to assist our training program in improving potential weak areas.

ENCLOSURE 2 (Continued)

COMMENTS ON SALP REPORT FOR PLANT VOGTLE

3. Increased surveillance reverification where selected contractor work is reinspected by GPC Quality Control inspectors to assure adequacy of the contractor's inspection activity.

SAFETY-RELATED COMPONENTS - MECHANICAL

Our performance was evaluated as Category 1. We are taking steps to further enhance this area. We have recently organized our equipment maintenance and storage group and are verifying the status of the equipment in our preventive maintenance program. We have also designated areas of cleanliness throughout the plant to further strengthen this program.

FIRE PROTECTION/PREVENTION SYSTEMS

Our performance was evaluated as Category 2. We have addressed the unresolved issues identified in the report and will continue to enhance our fire protection program. We have revised our fire protection program and clarified the procedures. The fire dampers are now tested both prior to and after installation and the Work-In Progress (WIP) packages utilized by the HVAC contractor provide better instructions for installation. Improvements have also been made to further enhance our records system.

ELECTRICAL EQUIPMENT AND CABLES

Our performance was evaluated as Category 2 with performance improving throughout the report period. We intend to assure performance continues to improve. As NRC noted, we have increased our management involvement in this area and a reorganization has increased our supervisor/lead inspector-to-inspector ratio. The quality control technical support group has been established and provides a broad experience base to support the inspection effort.

QUALITY PROGRAMS AND ADMINISTRATIVE CONTROLS AFFECTING QUALITY

Our performance was evaluated as Category 1. As noted in the report, our Quality Concerns Program has been effective in identifying and correcting employees' concerns. Quality concerns, as well as readiness review findings, are evaluated by quality assurance for incorporation into the audit programs to ensure programmatic problems are addressed and assure root causes are corrected. Many of the supervisory type issues addressed in quality concerns would not have been otherwise identified in our previous audits and surveillances. We have strengthened our ongoing audit program by performing annual assessments of contractor programs and broad-scoped assessments of particular concerns such as the electrical and welding areas.

ENCLOSURE 2 (Continued)

COMMENTS ON SALP REPORT FOR PLANT VOGTLE

LICENSING ACTIVITIES

Our performance was evaluated as Category 2. We have increased the staff of the project licensing manager and have relocated a staff member to the job site to better coordinate site licensing activities and further enhance our overall licensing effort.

CONCLUSION

We feel this SALP evaluation was representative of the Project's performance and we are committed to further enhance our programs to make our performance even better.