



Georgia Power

the southern electric system

D. O. Foster
Vice President and Project
General Manager
Vogtle Project

05 DEC 17 P 3: 50

December 10, 1985

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

File: X7BG10
Log: GN-756

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

Attention: Mr. Roger D. Walker

The Georgia Power Company wishes to submit the following additional information to supplement our response (GN-743 dated November 15, 1985) to the violation identified in NRC inspection report 50-424/85-43 and 50-425/85-32:

Due to questions raised by our NRC Resident Inspectors, Georgia Power Company recognizes the need to clarify some of the information provided in our earlier response and to provide additional information on long-term corrective actions.

The walkdown inspection prior to dust blowdown operations is not the primary means of providing equipment protection in the construction equipment maintenance program as may have been inadvertently implied in the earlier response. The walkdown is merely a final check that the required equipment protection is in place before beginning blowdown operations. Therefore the violation relative to the four valves stored in the Unit 2 Containment is attributable to a failure to adequately protect the valves in accordance with the equipment maintenance program and a failure to perform the required area walkdown prior to blowdown activities.

The followup inspection conducted November 6, 1985, covered more than the four valves cited in the violation. The inspection covered general maintenance and storage of valves in the Unit 2 Containment with emphasis on designated valve storage areas. No discrepancies beyond those cited in the violation were found.

To thoroughly assess the adequacy of the construction equipment maintenance program, a special surveillance will be conducted by quality control personnel of equipment protection in the power-block area. The results of the surveillance will be documented and will be reviewed and evaluated by construction management. Additional corrective actions which may result from the special surveillance will also be documented.

8512240258 851210
PDR ADOCK 05000424
PDR
Q

IE011/0

In the earlier response, it was stated that Nuclear Operations "attempted" to conduct a review of other valves which were disassembled for flushing purposes. As a clarification to this statement, Nuclear Operations did conduct a review of disassembled valves. This review was limited to valves disassembled for flushing purposes and, since no other disassembled valves were stored in the plant, no inspection for proper storage and protection was possible.

Relative to the Train "A" Remote Shutdown Panel, the earlier response indicated that Nuclear Operations was unable to determine the cause of the panel door being open at the time of the NRC inspection. Further reviews in this area have determined that the doors were intentionally left open for a time to ensure adequate ventilation to the panel interior, which was being heated by an electric light bulb for moisture protection.

To prevent further violations, the following actions are being implemented:

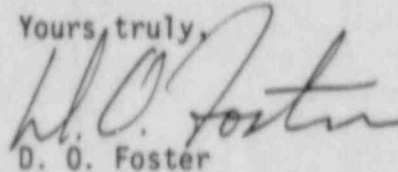
1. Georgia Power Company and Pullman Power Products, the piping contractor, have assigned personnel to monitor construction field storage conditions for valves and other equipment during each shift to ensure that covers and other protective methods are properly maintained. Also, the established requirements for area walkdowns prior to dust blowdowns have been emphasized to appropriate personnel.
2. Nuclear Operations personnel conduct surveillance of designated turned-over equipment as required by Startup Procedure SUM-25 under the direction of the Shift Supervisor. The surveillance includes, as appropriate, verification of area cleanliness, air filter cleanliness, equipment door closure, maintenance of protective coverings, and work activities in the surveillance areas. The frequency of the equipment surveillance is determined by the Shift Supervisor and appropriate test personnel by considering equipment environment and testing in progress.
3. Nuclear Operations is developing an area access control plan which requires joint participation with construction to ensure equipment protection and cleanliness is maintained. The plan will apply to all areas of the plant which are not turned-over to operations and are not specifically designated as a controlled area by construction. The plan will be designed to ensure the safety of personnel and the integrity of startup testing activities. Basically, the plan will provide applicable areas with a Level I, II, or III designation. Level I areas are the most restrictive and require distinct lock-and-key access control and will be marked by appropriate signs. Keys to Level I areas will be controlled by the Shift Supervisor. Some examples of Level I areas are Class 1E large motor or pump areas, Class 1E instrument or control panel areas, DC battery rooms and switchgear rooms, Non-1E vital or essential instrument areas, and high voltage switchgear rooms.

Level II areas will also be marked by appropriate signs and access will be controlled through common-keyed locks. Keys to Level II areas will be issued to the Shift Supervisor and to Construction Area Coordinators. All other applicable areas will be designated as Level III areas and will not require marking or special access controls. Compliance with the area access control plan will be monitored under the direction of the Shift Supervisor during each shift.

The special surveillance to be conducted by construction quality control and the implementation of the area access control plan are expected to be completed by January 31, 1986.

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

Yours truly,



D. O. Foster

REF/DOF/tm

xc: U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

R. J. Kelly
G. F. Head
J. T. Beckham
D. O. Foster
R. H. Pinson
P. D. Rice
B. M. Guthrie
D. E. Dutton
R. A. Thomas
D. R. Altman
J. A. Bailey
NRC Sr. Resident

O. Batum
G. Bockhold
C. E. Belflower
H. H. Gregory
E. D. Groover
L. T. Gucwa
C. W. Hayes
G. A. McCarley
R. W. McManus
W. T. Nickerson
D. S. Read

D. L. Kinnsch
F. B. Marsh (BPC)
C. S. McCall (OPC)
J. L. Vota (W)
E. L. Blake, Jr.
(Shaw, et. al.)
J. E. Joiner
(Troutman, et. al.)
D. C. Teper (GANE)
L. Fowler (LEAF)
T. Johnson (ECPG)