

NOTICE OF VIOLATION

Southern Nuclear Operating Company, Inc.
Vogtle Electric Generating Plant
Units 1 and 2

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

During an NRC inspection conducted February 2, 1997, through March 15, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (NUREG 1600), the violations are listed below:

- A. Technical Specification (TS) Surveillance Requirement (SR) 3.7.5.1, Auxiliary Feedwater System, requires that each manual valve in each water flow path for the three auxiliary feedwater (AFW) pumps that is not locked, sealed, or otherwise secured in position be verified in the correct position every 31 days.

Contrary to the above, from October 5, 1996, until February 6, 1997, the positions of valves 2-1302-U4-180 through -185 were not verified every 31 days as required. These six valves are in the AFW pump recirculation flow paths.

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

This violation is applicable to Unit 2 only.

- B. Technical Specification Section 5.4.1.d, Fire Protection Program, states that written procedures shall be established, implemented, and maintained covering the fire protection program.

Paragraph 2.G of the operating license for Units 1 and 2 requires the licensee to implement and maintain in effect all provisions of the approved fire protection program as described in the Updated Final Safety Analysis Report (UFSAR).

UFSAR Table 9.5.1-10, Item 1.4.1 states that each required fire detection instrument which is accessible during plant operation shall be demonstrated operable at least once per 12 months by performance of a trip actuating device operational test.

Procedures 29227-1 and -2, Fire and Smoke Detector Operational Test (Panel LZIP 2-1813-Q3-F27), Revision 1, and 29231-1 and -2, Fire and Smoke Detector Operational Test (Panel LZIP 1-1813-Q3-F31), Revision 2, require that operational tests on the fire detection panel and fire detectors be performed once every 24 months on a staggered test basis, thus implementing the 12-month performance test required by UFSAR Table 9.5.1-10.

Contrary to the above, the time between operational tests for the fire detectors supplied by Panels LZIP 1-1813-Q3-F31 and LZIP 2-1813-Q3-F27 exceeded 12 months. Specifically, the time between the February 11,

Enclosure 1

1996, and June 17, 1994 tests for Panel LZIP 1-1813-Q3-F31 was approximately 19 months and 11 days and the time between the January 22, 1997, and November 1, 1994, tests for Panel LZIP 2-1813-Q3-F27 was approximately 25 months and 22 days.

This is a Severity Level IV violation (Supplement I)

- C. 10 CFR 50.71(e) states, in part, that each person licensed to operate a nuclear power reactor shall update periodically the UFSAR to assure that the information included contains the latest material developed. The updated UFSAR shall be revised to include the effects of all changes made to the facility and the analysis of new safety issues performed. Revisions to the UFSAR must be filed annually or six months after each refueling outage provided that the successive updates to the UFSAR does not exceed 24 months.

Procedure 00402-C, Licensing Document Change Request (LDCR), Revision 15, provides instructions for changes to licensing documents. (The current procedure is Revision 15; however, the following requirements have existed for several years and were in effect on the date when the required UFSAR changes were identified.) Section 2.2 of this procedure requires a form, similar to that of Figure 1 of the procedure, to be used to initiate a change, document the change, and approve requests for changes to licensing documents. Section 3.3 requires the originator of an LDCR to complete applicable portions of the LDCR form, describe the proposed change, provide justification for the change and identify other affected documents. Section 3.4 requires the originating department manager to assign a qualified individual to perform the necessary supporting evaluations for the LDCR.

Contrary to the above, required 10 CFR 50 Appendix R related changes to the UFSAR were identified by the licensee, but an LDCR form was not initiated by the problem identifiers, supporting evaluations for the changes were not developed, and the UFSAR was not revised to reflect actual as-built plant conditions related to Appendix R safe shutdown issues. In addition, several other issues were also identified in which an appropriate LDCR form was not prepared to perform the required safety review and make the appropriate changes to the UFSAR or other licensing related documents.

This is a Severity Level IV violation (Supplement I)

- D. 10 CFR 50, Appendix B, Quality Assurance Criteria, Section III, Design Control, requires the licensee to, in part, provide design control measures for verifying or checking the adequacy of design, such as by the performance of design reviews, by the use of alternate or simplified calculational methods or by the performance of a suitable testing program.

Contrary to the above, the licensee did not verify the adequacy of the Woodward Governor Company (WGC) 701 Digital Speed Control (DSC) design by the performance of an acceptable design review or by the performance of a suitable testing program. Several deficiencies had been identified by vendor program deficiency notices dated September 13, 1993. Also, inconsistencies between the original start up setpoint data, dated September 30, 1994, and setpoints downloaded from the Train 1A diesel generator as well as DSC calibration constants recorded on March 24, 1996, compared to data downloaded from the Train 1A diesel generator were noted.

This is a Severity Level IV violation (Supplement I)

- E. 10 CFR 50, Appendix B, Quality Assurance Criteria, Section XVII, Quality Assurance Records, requires the licensee to, in part, maintain records to furnish evidence of activities affecting quality. The records shall include at least the following: Operating logs and the results of reviews, inspections, tests, audits, monitoring of work performance, and materials analyses.

Contrary to the above, the licensee failed to maintain records of safety-related equipment settings and calibration constants under configuration control in that there was no record of accessing the 701 DSC settings since September 30, 1994, resulting in discrepancies between the current 701 DSC setpoints for the Train 1A Diesel Generator and the setpoints contained in the test data sheets.

This is a Severity Level IV violation (Supplement I)

- F. 10 CFR 50.59, Changes, tests, and experiments, in part, prohibits, the licensee from making any change which constitutes an unresolved safety question.

Contrary to the above, the licensee's 10 CFR 50.59 safety evaluation associated with Design Change Package (DCP) 93-V1N0050-0-1, dated February 28, 1994, and supporting documentation did not provide an acceptable basis to conclude that the 701 governor modification does not create a possibility for a malfunction of a different type than any previously evaluated in the FSAR.

This is a Severity Level IV violation (Supplement I)

Pursuant to the provisions of 10 CFR 2.201, Southern Nuclear Operating Company, Inc. 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 14th day of April 1997