



Southern Nuclear Operating Company

the southern electric system

J. D. Woodard
Vice President
Farley Project

February 23, 1993

Docket Nos. 50-348
50-364

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Joseph M. Farley Nuclear Plant
Reply to Notice of Violation
Report Number 50-348/92-35-01 and 364/92-35-01
NRC Inspection of December 8, 1992 - January 8, 1993

Gentlemen:

This letter refers to the violation cited in the subject inspection report.
The violation states:

10 CFR Part 50, Appendix B, Criterion XV, and the J.M. Farley Plant Operations Quality Assurance Policy Manual, require that measures shall be established to control materials which do not conform to requirements in order to prevent their inadvertent use or installation.

Contrary to the above, prior to August 9, 1992, lubricating oil was not properly controlled in that oil other than that specified in the applicable equipment lubrication and vendor manuals was used in safety-related equipment. Site lubrication oils were procured "commercial-grade" and used in safety-related applications without assuring their suitability for use in the intended safety-related applications. This resulted in a misidentified barrel of Texaco "R&O 68" oil being used in applications where the use of "R&O 32" oil was specified.

This is a Severity Level IV violation (Supplement 1).

Admission or Denial

The above violation occurred as described in the subject report.

Reason for Violation

The cause of this violation was personnel error, in that, lubricating oils were not properly classified in the FNP inventory system. FNP personnel applied non-safety related controls to lubricating oils that eventually were used in both safety and non-safety related applications. As a result, lubricating oils were not properly evaluated, purchased, and issued in accordance with the appropriate procedural controls governing safety-related materials.

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Corrective Action Taken and Results Achieved

Lubricants that were not being adequately controlled have been reclassified in the FNP inventory system. Unused containers of lubricants were placed under the control of the Material Department. Lubricants used in safety related applications that are under the control of the Material Department have been "dedicated" for safety related use under the applicable FNP Commercial Grade Item Dedication Plan.

Oils that are under the control of the Operations Department have been sampled and analyzed to verify their acceptability for use in safety related components. Partially used containers of grease have been discarded.

Corrective Steps To Avoid Further Violations

Lubricants are now being properly classified, purchased, issued, evaluated, and controlled in accordance with FNP-O-AP-9, Procurement and Procurement Document Control, and FNP-O-AP-21, Identification and Control of Materials, Parts and Components.

Each FNP Manager has reviewed his work activities and identified other materials that may need additional controls. The use of these items will be evaluated and controls established as necessary.

Date of Full Compliance

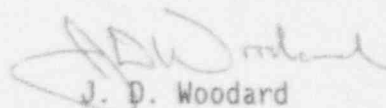
March 1, 1993

Confirmation

I affirm that this response is true and complete to the best of my knowledge, information, and belief. The information contained in this letter is not considered to be of a proprietary nature.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY


J. D. Woodard

EFB:cht-NOV-OIL.EFB
NEL-93-0074

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Mr. S. T. Hoffman
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