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USNRC REGION II
ATLANTA, GEORGIA

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Alabama Power

the southern electric system

July 6, 1983

Docket No. 50-348
Docket No. 50-364

Mr. R. C. Lewis
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W.
Suite 3100
Atlanta, GA 30303

**SUBJECT: J. M. Farley Nuclear Plant NRC Inspection
of April 25-29, 1983 and May 2-6, 1983**

**RE: Report Numbers 50-348/83-13
50-364/83-11**

Dear Mr. Lewis:

This letter refers to the violations in the subject inspection report which states:

"As a result of the inspection conducted on April 25-29 and May 2-6, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

- A. 10 CFR 50 Appendix B, Criterion V and the accepted Quality Assurance Program (FSAR Chapter 17) require activities affecting quality to be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, documented procedures implementing the licensed operator requalification program do not contain appropriate measures for determining that important activities have been satisfactorily accomplished in that:

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1. Section C.2 of Enclosure 1 to the March 28, 1980, letter from the Director of the Office of Nuclear Reactor Regulation specifies acceptance criteria for requiring a licensed individual to participate in an accelerated requalification training. Although Farley Nuclear Station is conforming to these requirements, they are not prescribed in documented instructions.
2. Section C.3 of Enclosure 1 to March 28, 1980, letter discussed above identifies reactivity control manipulations that are required to be incorporated into a licensee's requalification program. Measures have not been incorporated into the requalification program to assure that these requirements are met. As a result, one required manipulation has not been performed by various licensed personnel as described in Violation B.
3. 10 CFR 55, Appendix A, Section 3.d, requires each licensed operator review the contents of all abnormal and emergency procedures on a regularly scheduled basis. Measures have not been established to assure that these requirements are performed. In addition, the frequency for accomplishing this requirement has not been established.
4. 10 CFR 55.31(e) requires that if a licensed individual has not been actively performing the functions of an operator or senior operator for a period of four months or longer, he shall demonstrate to the Commission that his knowledge and understanding of facility operation and administration are satisfactory prior to resuming licensed duties. Although no licensee was identified that had performed the functions of a licensed operator in violation of this requirement, measures have not been established to formally document the removal and reinstatement of personnel who are subject to this requirement."

Admission or Denial

The above violation occurred as described in the subject report.

Reason for Violation

This violation was due to procedural inadequacy. Qualitative and quantitative acceptance criteria for the licensed operator requalification program were not contained in FNP-0-AP-45 (Farley Nuclear Plant Training Plan) or FNP-0-M-15 (Master Training Plan) as follows:

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1. Criteria for requiring a licensed individual to participate in accelerated requalification training were not qualitatively or quantitatively specified in programmatic documents.
2. All reactivity control manipulations specified by Harold Denton's letter dated 3/28/80 were not incorporated into the requalification program (i.e., loss of instrument air).
3. Programmatic documents did not specify that each licensed operator periodically review the contents of all Abnormal and Emergency Procedures on a regularly scheduled basis, measures to specify how to accomplish the requirement or the time frame for the periodic review.
4. Measures had not been established to formally document removal or reinstatement requirements for personnel who had not been performing the functions of an operator or senior operator for a period of 4 months or longer.

Corrective Action Taken and Results Achieved

Corrective action and results achieved for this violation are as follows:

1. A change was made to FNP-O-AP-45 to quantitatively specify the criteria for a licensed individual to participate in accelerated requalification training.
2. The Operations curriculum guide and the individual record of reactivity and control manipulations form have been revised to incorporate all required control manipulations.
3. A change was made to FNP-O-AP-45 to specify that all Abnormal and Emergency Procedures would be reviewed on a two-year cycle. The Operations curriculum guide and the individual record of reactivity and control manipulations form were changed to include the procedure review during a simulator retraining.
4. A change was made to FNP-O-AP-45 to formally document removal and reinstatement requirements for personnel who have not performed the functions of an operator or senior operator for a period of four months or longer.

Corrective Steps Taken to Avoid Further Violations

See above. All corrective action was completed by May 6, 1983.

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Date of Full Compliance

May 6, 1983.

"B. Technical Specification 6.4.1 requires a retraining and replacement training program for the facility staff to be maintained under the direction of the Training Superintendent and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55 and the supplemental requirements specified in Section A and C of Enclosure 1 of the March 28, 1980, NRC letter to all licensees and shall include familiarization with the relevant operational experience.

1. Section C.2 of Enclosure 1 requires a licensed individual to participate in accelerated requalification if he scores less than 80% overall or 70% in a category on the annual requalification examination.

Contrary to the above, due to a mathematical error during the grading process of an examination one individual was given 70% in a category when his actual score was 66.7%. Upon notification of this error by the inspector, the licensee immediately removed the individual from licensed duties and placed him in an accelerated training status.

2. Section C.3 of Enclosure 1 requires that control manipulations identified in Enclosure 4 of the March 28, 1980, letter be performed as detailed in the enclosure. These manipulations are required to be performed over a two year period.

Contrary to the above, all required reactivity manipulations were not accomplished over a two year period. One required manipulation involving loss of instrument air had not been performed by any of the individuals selected for review. Two other personnel had not performed one other required manipulation involving loss of service water."

Admission or Denial

The above violation occurred as described in the subject report.

Reason for Violation

This violation was due to personnel error. Technical Specification 6.4.1 was not adhered to as follows:

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1. An individual was not placed in accelerated training due to a mathematical error in grading of the annual requalification examination.
2. Not all licensed personnel received all required control manipulations in accordance with Harold Denton's letter dated March 28, 1980.

Corrective Actions Taken and Results Achieved

Corrective action and results achieved for this violation are as follows:

1. FNP-O-AP-45 will be revised to include a technical review and mathematical verification of the grading on all annual license requalification examinations.
2. The vendor providing simulator training was immediately contacted and directed to ensure that all required control manipulations were being performed and documented. The Farley Plant reference simulator will be on-site and operational during the 3rd quarter of 1983. Subsequently, all required control manipulations, including loss of instrument air, will be conducted on the plant reference simulator. During the 1983-84 retraining year, all licensed personnel will complete all control manipulations specified in Harold Denton's letter dated March 28, 1980.

Corrective Steps Taken to Avoid Further Violations

See above. All corrective action is scheduled to be completed by June 25, 1983 and August 1, 1984 for items 1 and 2 respectively.

Date of Full Compliance:

August 1, 1984. This date is necessitated by the time required to complete the next training cycle which will include control manipulations involving loss of instrument air.

"C. Technical Specification 6.5.2.10.c requires that audit reports shall be forwarded to the Senior Vice President and to management positions responsible for the areas audited within 30 days after completion of the audit.

Contrary to the above, the following audits were not forwarded to these positions within 30 days after completion of the audit:

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<u>Areas Audited</u>	<u>Dates of Audit</u>	<u>Date Forwarded</u>
I&C STP	2/7 - 2/21/83	3/28/83
Procurement	1/31 - 2/15/83	3/28/83
Plant Operations	1/1 - 1/25/83	3/7/83
FNP Emergency Program	1/3 - 2/1/83	3/7/83
Quality Control	11/22 - 12/2/82	1/5/83
Unit 2 Refueling	10/25 - 12/2/82	1/5/83
Safety Program	10/25 - 12/3/83	1/5/83
Material Control Activities	2/21 - 3/7/83	4/12/83
Environmental Monitoring	2/15 - 3/4/83	4/12/83

These examples are not intended to be all inclusive."

Admission or Denial:

The above violation occurred as described in the subject report.

Reason for the Violation:

This violation was caused by personnel error. The date of the Post Audit Conference marks the completion of the audit. However, a date other than and prior to the Post Audit Conference date was recorded as the audit completion date on a number of audit reports during the past two years.

Corrective Action Taken and Results Achieved:

This error was reviewed with the Lead Auditors on the SSAER staff, and training regarding documentation of audit completion dates was conducted for the members of the SSAER staff engaged in auditing.

Corrective Steps Taken to Avoid Further Violations:

See above. All corrective action was completed on June 15, 1983.

Date of Full Compliance:

Full compliance with Technical Specification 6.5.2.10.c was achieved on May 17, 1983 with the issuance of Composite Audit Report No. 83/5.

Affirmation:

I affirm that this response is true and complete to the best of my knowledge, information and belief.

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The information contained in this letter is not considered to be of
a proprietary nature.

Yours very truly,


F. L. Clayton, Jr.

FLCJr/KWM:nac/G-16

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bc: Mr. J. M. Farley
Mr. W. O. Whitt
Mr. R. P. McDonald
Mr. H. O. Thrash
Mr. O. D. Kingsley, Jr.
Mr. D. S. Mask
Mr. J. W. McGowan
Mr. W. G. Hairston
Mr. W. H. Bradford
File: 91A3.27/G-14