

J. D. Woodard
Vice President-Nuclear
Farley Project

March 21, 1991



10CFR2.201

Docket No. 50-364

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

SUBJECT: Reply to a Notice of Violation
J. M. Farley Nuclear Plant NRC Inspection of
December 29, 1990 - February 13, 1991

RE: Report Number 50-364/90-36

Dear Sir:

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

Technical Specification 6.8.1 requires that applicable written procedures recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, 1978 shall be established, implemented and maintained.

Contrary to the above, complete and detailed written instructions were not in place for maintenance personnel to repair a pressure operated relief valve (PORV). On December 31, 1990, this lack of complete and detailed instructions, resulted in an inadvertent automatic actuation of the PORV at approximately 1730 psig rather than the recommended opening setpoint of approximately 2285 psig. This caused a subsequent RCS depressurization of approximately 100 psig during plant heatup. Isolation of the relief path was attained by prompt operator action and the closure of the associated PORV block valve.

Maintenance Work Request WR-213581, required that the valve actuator for PORV 445A, be removed, repaired, reinstalled, and returned to service. The instructions that were provided, as part of the work request, failed to provide sufficient guidance to assure that actuator spring tension was properly adjusted for the valve to open at the recommended setpoint.

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

It should be noted that the actual PORV opening setpoint is 2335 psig and not 2285 psig as stated in the violation.

JE01
11

Admission or Denial

The above violation occurred as described in the subject report.

Reason for Violation

This violation was caused by personnel error. I&C personnel did not adequately check the calibration setpoint to ensure proper PORV operation. A contributing cause was that the work sequence of the MWR for removing and reinstalling the actuator did not provide setpoint information.

Corrective Action Taken and Results Achieved

Spring tension was properly adjusted on PORV 445A.

Corrective Steps To Avoid Further Violations

1. All I&C personnel will be reinstructed to ensure proper calibration and setpoints are used when performing maintenance on air operated valve actuators.
2. The Daily Planning Group has been instructed to include detailed instructions for removing, reinstalling and calibrating air operated valve actuators.
3. I&C procedure FNP-O-IMP-444.1 has been enhanced to include instructions for removing, reinstalling and calibrating air operated valve actuators. The Pressurizer PORV is included in this procedure.

Date of Full Compliance

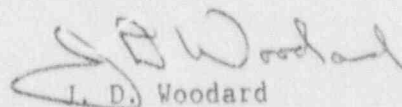
March 30, 1991

Affirmation

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,

ALABAMA POWER COMPANY


L. D. Woodard

JDW/BHV:maf5.18

cc: Mr. S. D. Ebner
Mr. S. T. Hoffman
Mr. G. F. Maxwell