

Mailing Address
Alabama Power Company
600 North 18th Street
Post Office Box 2641
Birmingham, Alabama 35291
Telephone 205 783-6081

F. L. Clayton, Jr.
Senior Vice President
Flintridge Building

USNRC REGION II
ATLANTA, GEORGIA

82 MAY 24 A 8:20



Alabama Power

the southern electric system

May 15, 1982

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

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

SUBJECT: Joseph M. Farley Nuclear Plant NRC Inspection of
December 26, 1981 through January 4, 1982

RE: Report Numbers 50-348/81-31
and 50-364/81-34

Dear Mr. Lewis:

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

"As a result of the inspection conducted on December 26 - January 4, 1982, the management meeting held on January 26, 1982, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified.

Technical Specification 6.8.1.a requires that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, 1978. Appendix "A" of Regulatory Guide 1.33, Revision 2, 1978, paragraph 1.c requires written procedures on equipment control (e.g., locking and tagging).

Contrary to the above, plant procedure FNP-0-SOP-0, General Instructions to Operations Personnel, was inadequate to provide strict valve key control for valve locking in that on December 28, 1981, the manual isolation valve on Unit 2 spray additive tank was found in the improper locked closed position. This closed valve disables both trains of spray addition".

Mr. R. C. Lewis
May 10, 1982
Page Two

Admission or Denial

The above violation occurred as described in the subject report.

Reason for Violation

The violation cited in the NRC inspection report was caused by inadequate procedural guidance.

Corrective Actions Taken and Results Achieved

- 1) Upon discovery of the problem, the valve was immediately opened and locked in the open position.
- 2) Extensive position verification checks were made of other valves with no similar positioning errors found. These valves included:
 - a) All locked valves outside containment
 - b) Residual Heat Removal System
 - c) High Head Safety Injection
 - d) Auxiliary Feedwater System
 - e) Post LOCA Containment Pressurization and Vent System
 - f) Diesel Generators
 - g) Penetration Room Filtration System
 - h) Emergency Air System

Corrective Steps Taken to Avoid Further Violations

The following steps have been taken to prevent recurrence of this violation:

- 1) Procedure FNP-0-SOP-0.0 (General Instructions to Operations Personnel) has been revised to provide the following instructions:
 - a) Each time a key is to be used, the logsheet for the specific component must be filled out. Entries are to include date, time and signature.
 - b) When the key is returned, the remaining portion of the sheet is to be completed. This includes the position the component was found in, date, time, signature and position in which the component was left.
 - c) When the key is returned, if a component has been left in a position other than normally required a brief reason must be stated on the logsheet.

Mr. R. C. Lewis
May 10, 1982
Page Three

- d) When a key is returned and the logsheet is completed, the shift foreman will review the entries and initial the sheet.
- 2) The use of the master keys which can open locked valves has been administratively restricted to Operations Supervision.
- 3) A review of all STP's has been conducted and four STP's were changed to have appropriate verifications incorporated.
- 4) Operations personnel have been reinstructed concerning double valve verification controls.

Please note that the above items also indicate strengthened management controls in the area of valve verification.

Date of Full Compliance

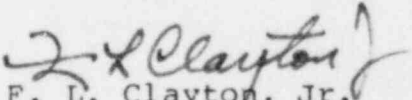
All Corrective action was completed by January 25, 1982.

Affirmation

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

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