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February 22, 1983

Docket No. 50-364

Director  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

**SUBJECT: J. M. Farley Nuclear Plant**  
**NRC Inspection Of October 28 - November 2, 1982**

RE: Report No. 50-364/82-25

Dear Sir:

This letter is submitted in response to the violation in the subject inspection report which states: "On October 28, 1982, the licensee notified the NRC Senior Resident Inspector at the Farley Nuclear Plant and NRC Region II that the containment spray header isolation valves in each of the two supply headers had been found by the licensee to be improperly locked in the closed position.

On October 28 - November 2, 1982, the Senior Resident Inspector conducted a special inspection to determine the facts relating to the incident. The inspection revealed that the valves probably had been closed since the startup of Unit 2 on May 5, 1981.

The inspection findings indicate that because of an unusually long valve stem on the containment spray header isolation valves, operations personnel mistakenly believed the valves to be open when they were visually checked for correct positioning. The failure to confirm valve position and reliance on valve appearance indicates a failure to exercise the meticulous attention to detail which the NRC expects of its licensees. Therefore, the Nuclear Regulatory Commission proposes to impose a civil penalty in the amount of Forty Thousand Dollars for this matter. In accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C, 47 FR 9987, March 9, 1982), and pursuant to Section 234 of the Atomic Energy Act of 1954, as amended ("Act"), 42 U.S.C. 2282, PL 96-295, and 10 CFR 2.205, the particular violation and associated civil penalty is set forth below:

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Technical Specification 3.0.4 states that entry into an operational mode shall not be made unless limiting conditions for operation have been satisfied without recourse to action statements. Technical Specification 3.6.2.1 states that two independent containment spray systems shall be operable when the reactor is in Modes 1, 2, 3 and 4. Contrary to the above, on at least one occasion between May 5, 1981 and October 22, 1982, the licensee entered an operational mode, and operated the reactor, without having satisfied the limiting condition for operation requiring operability of two independent containment spray systems. During this period, closed isolation valves in the containment spray header rendered both systems inoperable."

I. Admission or Denial

The above violation occurred as described in the subject report.

II. Reason for Violation

The violation cited in the NRC Inspection Report was the result of a procedural inadequacy in combination with the valves not being in conformance with design drawings. The subject valves had been closed during the final days of startup testing, prior to initial fuel loading. The valves were closed at this time as a precaution against inadvertent spray actuation during final testing. Subsequently, position verification of locked open valves consisted of visual verification that the valve stem was fully extended and verification that the locking device was securely locked and in good condition. Contrary to the design drawings indicating that the valve stem would be flush with the handwheel when the valve is closed; the valve stem extended approximately six (6) inches above the handwheel when in the closed position. Therefore, when visual verification of these valves were made, the valves appeared to be in the open position and were noted as such.

III. Corrective Actions Taken and Results Achieved

The following corrective measures have been or will be taken in conjunction with this event.

- 1) Verified by physical movement that the corresponding valves on Unit 1 were locked open. (Completed 10/28/82)
- 2) Verified all other accessible locked valves by physical valve movement. (Completed 10/28/82)
- 3) Provided temporary change to procedure to require verifying valve position of locked valves as follows:

Locked Closed - Attempt to move handwheel or operator in the closed direction. If valve is in the correct position, no motion will occur. If unable to move the operator because of the locking device, remove the locking device and attempt to move the operator in the closed direction. Re-install the locking device and verify that it is securely locked and in good condition. If the locking device was unlocked a second verification of the locking device installation is required.

Locked Open - Attempt to move handwheel or operator in the closed position only enough to verify valve movement. The handwheel or operator should turn, indicating the valve is open. Return valve to original position. If unable to move the operator due to the locking device, remove the locking device and attempt to move the operator, or handwheel in the closed direction only enough to verify valve movement. Return valve to original position. Re-install the locking device and verify that it is securely locked in good condition. If the locking device was unlocked, a second verification of the locking device installation is required.

A fourth step in the verification sequence has been added for locked valves in which the locking device is verified to be properly secured and locked if the valve was unlocked to verify position. (Completed 10/28/82)

- 4) Conducted extensive investigation to determine all possible opportunities for this valve to be operated.  
(Completed 11/5/82)
- 5) Conducted investigation to determine why the valve stem was longer than the design drawing specifications.  
(Completed 11/18/82)
- 6) Performed design change to modify valve stem length so that it is flush with valve operator when the valve is shut.  
(Completed 11/18/82)
- 7) Performed validation of valve verification instruction.  
(Completed 12/28/82)
- 8) Validation findings have been incorporated into valve verification instructions and will be approved 3/1/83.

- 9) Developed training for Operations Personnel to insure that they have increased awareness and a feel for pitfalls with valve operations. (Completed 12/28/82)

IV. Corrective Steps Taken to Avoid Further Violations

See Item III.

V. Date of Full Compliance

Immediate corrective action to achieve compliance was completed October 28, 1982. Followup corrective action to ensure continued compliance will be completed by March 1, 1983.

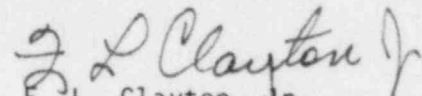
Affirmation

With regard to the above violation, 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.

Enclosed is payment of the proposed civil penalty in the form of a check to the Treasurer of the United States for Forty Thousand Dollars (\$40,000).

Sincerely yours,

  
F. L. Clayton, Jr.

FLCJr/KWM:cb

Enclosure

xc: Director, RII  
File

DCS

## BILL FOR COLLECTION

Bill No. \_\_\_\_\_

U. S. Nuclear Regulatory Commission

Date Feb. 28, 1983

(Department or Establishment and Bureau or Office)

Washington, DC 20555

(Address)

PAYER:

Alabama Power Company  
P.O. Box 2641  
Birmingham, AL 35291

*This bill should be returned by the  
payer with his remittance.*

*SEE INSTRUCTIONS BELOW.*

Date	DESCRIPTION	Quantity	Unit Price		Amount	
			Cost	Per		
2/28/83	Received from Docket No. 50-364 payment for CP dated February 2, 1983.				\$40,000.00	
AMOUNT DUE THIS BILL,					\$ 40,000.00	

*This is not a receipt*

### INSTRUCTIONS

Tender of payment of the above bill may be made in cash, United States postal money order, express money order, bank draft, or check, to the office indicated. Such tender, when in any other form than cash, should be drawn to the order of the Department or Establishment and Bureau or Office indicated above.

Receipts will be issued in all cases where "cash" is received, and only upon request when remittance is in any other form. If tender of payment of this bill is other than cash or United States postal money order, the receipt shall not become an acquittance until such tender has been cleared and the amount received by the Department or Establishment and Bureau or Office indicated above.

Failure to receive a receipt for a cash payment should be promptly reported by the payer to the chief administrative officer of the bureau or agency mentioned above.

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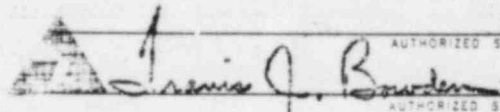
**ALABAMA POWER COMPANY**

CHECK NO.

**BIRMINGHAM, ALA.**VOUCHER NO.  
83-10376**PAY TO THE ORDER OF**

TREASURER OF THE UNITED STATES

\*\*\$40,000.00\*\*

**PAYABLE AT**

 AUTHORIZED SIGNATURE  
 AUTHORIZED SIGNATURE

⑈616373⑈

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DATE ENTERED	VENDOR'S REFERENCE	VENDOR'S DATE			GROSS AMOUNT OF INVOICE	CASH DISCOUNT	BALANCE PAYABLE
		MO.	DA.	YR.			
FEB 15'83	803-852	02	14	83	40,000.00		40,000.00⑈
CIVIL PENALTY: EA-82-137 REPORT NO. : 50-364/82-25  BEVERLY JONES ROOM B-300 FLINTRIDGE BUILDING  <b>RUSH</b>							

WE HEREWITH TENDER OUR CHECK IN FULL PAYMENT OF YOUR INVOICES LISTED HEREON OR OTHER CLAIMS DESCRIBED HEREON. ENDORSEMENT OF ATTACHED CHECK IS SUFFICIENT RECEIPT. IF AMOUNT IS INCORRECT, PLEASE RETURN STATEMENT WITH CHECK ATTACHED. DETACH CHECK BEFORE DEPOSITING.

**ALABAMA POWER COMPANY**

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