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December 16, 1994

the southern electric system

Docket Numbers: 50-348
50-364

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

Joseph M. Farley Nuclear Plant (FNP)
Reply to a Notice of Violation (VIO) and an Unresolved Item (URI)
NRC Inspection Report Nos. 50-348/94-24 and 50-364/94-24

Gentlemen:

As requested by your transmittal dated November 8, 1994, this letter responds to both VIO 50-348, 364/94-24-03, "Failure to Update Controlled Procedures and Drawings", and URI 50-348, 364/94-24-02, "Inadequate Annual Fire Protection Exercise." The Southern Nuclear Operating Company (SNC) response to VIO 50-348, 364/94-24-03 and to additional questions related to this VIO are provided in Attachment 1. The SNC response to URI 50-348, 364/94-24-02 is provided in Attachment 2.

Confirmation

I affirm that the responses are true and complete to the best of my knowledge, information, and belief.

Respectfully submitted,

Dave Morey

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Attachments

cc: Mr. S. D. Ebner
Mr. B. L. Siegel
Mr. T. M. Ross

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ATTACHMENT I

RESPONSE TO VIO 50-348, 364/94-24-03

RESPONSE TO VIO 50-348, 364/94-24-03

Notice of Violation VIO 50-348, 364/94-24-03 states the following:

10 CFR Part 50, Appendix B, Criterion VI, "Document Control," as implemented by the J. M. Farley Plant Operations Quality Assurance Policy Manual, Revision 31, Chapter 6, "Document Control," Section 6.4.1, states in part that "Document Control measures shall provide for confirmation of receipt by the user, prompt entry of changes, and the removal of the superseded matter to prevent inadvertent use." And it also states that, "Each manager [i.e., General Manager - Farley Nuclear Plant] ... shall require periodic verification that the controlled documents are complete and up to date."

Contrary to the above:

A large number of controlled plant procedures and drawings, including those at the Unit 1 and 2 Hot Shutdown Panels (previously identified on September 9, 1994), were not complete nor up to date, and contained superseded matter. Document Control had more than 200 overdue document transmittal notices to controlled copy holders that indicated these holders were not updating their procedures and drawings with the latest revisions. In addition, a significant percentage of controlled copy holders were not responding in a timely manner, or at all, to annual surveys by Document Control to verify the documents in their possession were complete and up to date.

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

In addition, the NRC transmittal letter dated November 8, 1994, states:

This response should also explain and address corrective actions for the extended time the violation existed, to what degree safety-related activities were conducted at FNP using out of date procedures or drawings, and the nature of the violation that involved so many different controlled copy holders, procedures, and drawings.

Summary of Identified Items

VIO 50-348, 364/94-24-03 can be divided into the following items:

- Some physics curves at the Units 1 and 2 Hot Shutdown Panels were not maintained current.
- Some document transmittals were not returned in a timely manner.
- The overdue document transmittal notices were not being actively pursued by Document Control.
- Some of the 1993 Annual Procedure Verification Reports were not returned in a timely manner.
- Some controlled plant procedures and drawings were not complete, up-to-date, or contained superseded matter.

Admission or Denial

The violation occurred as described in the Notice of Violation.

Reason for Violation

The reason for this violation is personnel error.

At Farley, we have a strong commitment to performing safety related activities using current, approved procedures and drawings.

In our review of this violation we found isolated instances of out-of-date procedures and drawings where they might be used. Many of these out-of-date procedures were non-safety related. Further, most of these procedures are for reference purposes and are not used for day-to-day activities. Interviews with copy holders and a records check revealed no evidence where safety related activities were performed using out-of-date procedures or drawings.

Further, our review determined that while our people are committed to performing work using up-to-date procedures and drawings, we had a programmatic weakness in our document transmittal and verification feedback system.

Controlled copy holders were receiving the transmittals and entering the changes properly, with the exception of a few isolated instances. However, some individuals were not returning their transmittal forms as our procedure required. Further, our procedure requires that any transmittal form not returned within 14 days should be referred to the appropriate supervisor for disposition. Document Control supervision failed to adhere to this requirement. Further, Document Control supervision failed to follow up when the 1993 Annual Procedural Verification Reports were not returned. For the most part procedure holders were performing the annual verification, but were not providing the necessary feedback to Document Control.

Corrective Actions Taken and Results Achieved

1. Controlled procedures and curves located at the Units 1 and 2 Hot Shutdown Panels were reviewed to ensure that they were complete, up-to-date, and did not contain superseded matter. Identified discrepancies have been resolved.
2. The referenced backlog of overdue document transmittals has been resolved.
3. In addition to resolving the referenced backlog of overdue transmittals, the 1994 Annual Procedure Verification Reports have been returned with the exception of 2 procedures in Units 1 and 2 Containment and 132 procedures held by an off-site agency. Identified discrepancies have been resolved.
4. The controlled copies of plant curves were reviewed to ensure that they were complete, up-to-date, and did not contain superseded matter. Identified discrepancies have been resolved.

Corrective Actions Taken and Results Achieved (Continued)

5. A large sampling of drawings have been audited in various permanent locations and no significant problems were identified.
6. Vendor manual verifications are in progress.
7. Interviews with copy holders and a records check revealed no evidence where safety related activities were performed using out-of-date procedures or drawings.

Corrective Steps to Avoid Further Violations

1. The Document Control Supervisor has been counseled as to his responsibilities.
2. Document Control employees have been reminded of the importance of following the requirements concerning control of plant documents.
3. Controlled copy holders will receive a letter from the FNP Vice President discussing this violation and emphasizing their responsibility to provide timely feedback of their accomplishment of procedure management activities.
4. The transmittal form will be enhanced to provide guidance to controlled copy holders.
5. SAER audits of the implementation of procedure management activities will be increased until we are satisfied our standards are consistently met.

Date of Full Compliance

Corrective action steps to achieve full compliance will be completed by February 28, 1995. SAER audits will extend beyond this date to monitor compliance.

ATTACHMENT 2

RESPONSE TO URI 50-348, 364/94-24-02

The NRC requested a response, within 30 days, regarding what remedial actions were necessary to address the lack of effectiveness of the annual Fire Protection drill held on September 13, 1994.

FNP Response

We believe FNP's fire brigade training is a strength and that our drills and practice sessions thoroughly train and demonstrate the full range of our fire fighting capabilities.

We agree that the observed fire drill did not fully exercise all aspects of our capabilities. However, the drill objectives were met. Our drills, practices and training fully exercise all aspects of our capabilities to demonstrate that we can adequately protect important structures, systems, and components from fire, including effectively fighting large on-site fires.

The inspection report listed the following inspector findings:

- 1) Most of the FNP and Dothan emergency fire fighting equipment that could have been practicably tested and/or demonstrated were not used during the drill.
- 2) FNP did not bring foam to the fire site.
- 3) Dothan Fire Department brought half of its normal supply of foam.
- 4) Inadequate first aid supplies and no medical response personnel.
- 5) The river water intake structure (RWIS) wasn't searched for unaffected personnel to evacuate or account for.
- 6) Overall lack of scenario realism.

Specific responses follow.

Finding 1

Two different methods are used to allow the FNP fire brigade to practice and be evaluated as a team - **fire drills** and **practice sessions**. Fire drills are simulations of fire events. They are staged at various locations both in the plant and on the plant grounds. During most fire drills, hoses are routed. Practice sessions require the fire brigade to extinguish a fire similar to one that might occur in the plant. The practice sessions are typically held at the on-site Fire Training Facility where both inside and outside fires are set using diesel fuel or other materials. A variety of fire fighting equipment is utilized to combat the fires. Each fire brigade member is required to participate in at least two fire drills per year and one practice session per year.

To accomplish this required participation, one fire drill per quarter, per crew, is scheduled (24 drills per year) so that each fire brigade member attends the minimum of two fire drills per year. Practice sessions are scheduled such that each fire brigade member will attend at least one session per year. Therefore, approximately 30 training events per year are scheduled for the fire brigade in addition to quarterly classroom lectures. Due to the broad range of potential fire situations that would involve the

Finding 1 (Continued)

fire brigade, and considering the number of training events scheduled during a year for fire brigade practice, each training event scenario is not developed to address every aspect of fire fighting or equipment usage. During one fire drill per year, the off-site fire fighting organization, the Dothan Fire Department (DFD), is required to participate. This fire drill is designed to evaluate the response of the DFD to FNP, and FNP's ability to coordinate fire fighting efforts with the DFD. The composite of items covered over the year in the training events adequately addresses all fire fighting techniques applicable to FNP.

During the 1994 annual fire drill, which involved the response of the DFD, fire hoses were routed at the fire scene, but were not connected to the fire truck. The fire fighting equipment used by FNP and the DFD is standard National Fire Protection Association Code equipment and has been verified in previous drills to be compatible.

Finding 2

While foam was not brought to the fire site, adequate means of combating the fire using fire hoses were available at the scene. Had the Fire Brigade Leader determined that foam was necessary to combat the fire he could have communicated the need to the plant and foam would have been transported to the RWIS. There was also one can of foam and an eductor available to the fire brigade from the DFD truck at the scene. The fact that a foam cart was not brought to the scene and set up was identified by the drill monitors in the critique summary as a drill comment.

Finding 3

The DFD did have one 5 gallon can of foam and an eductor available on their truck if needed. However, there is no requirement for the DFD to bring foam in response to an FNP request for assistance. Adequate supplies of foam and foam eductors are maintained on-site. The DFD does normally maintain two cans of foam on each truck.

Finding 4

The annual fire drill did include a response by a medical (first aid) person. This person responded to the Central Security Building in route to the drill scene. At this point, the drill monitor at the Central Security Building noted the response and informed the responder that the requirements for first aid response to the drill had been satisfactorily met. Therefore, the first aid responder was released from any further participation. An annual medical emergency drill is conducted which involves evaluating the effectiveness of first aid response in accordance with the applicable FNP Emergency Plan Implementing Procedures and is performed separate from the annual fire drill. In addition to a normal FNP first aid response, the DFD is equipped with additional first aid supplies and all Dothan firefighters are first aid and CPR qualified and would render assistance if needed.

Finding 5

The need to search the RWIS for occupants was discussed by the fire brigade leader and the drill monitor during the drill. In response to the fire brigade leader's question, the drill monitor informed the fire brigade leader that the RWIS was not occupied for the purposes of the drill and that a search would not be required to meet the drill objectives. Even though no one actually searched inside the RWIS, the fire brigade leader recognized the need for searching the RWIS had there been an actual fire.

Finding 6

In this drill, realism was adequate to demonstrate the drill objectives. A simulated airplane crash initiated the event at the RWIS which is about three quarters of a mile from the plant. This drill demonstrated that the plant fire brigade could respond to and assess the need for off-site assistance in a large on-site fire. In addition, the fire brigade could:

- identify the need for medical assistance
- determine the need for searching for possible injured or trapped personnel
- bring adequate equipment to the fire site to mitigate the fire effects until off-site assistance arrived
- effectively communicate and coordinate fire fighting efforts with DFD

Conclusion

As an enhancement to the fire program, the following items identified by the FNP drill monitors have been added to the Emergency Plan Punchlist for evaluation and resolution:

- Equip the Fire Brigade Van and Fire Tanker with a foam eductor nozzle and cans of foam.
- Place first aid kits at Central Security and in the Fire Brigade Van.

In summary, we believe that our fire protection program and training fully demonstrates the full ranges of our fire fighting capabilities.