

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

03 DEC 9 11:04



Alabama Power
the southern electric system

December 7, 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 September 11, 1983 - October 10, 1983**

**RE: Report No. 50-348/83-26
Report No. 50-364/83-24**

Dear Mr. Lewis:

This letter refers to the violations in the subject inspection reports which state:

"As a result of the routine inspection conducted on September 11 - October 10, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

- A. Technical Specifications Section 3.6.2.2.b requires that "two spray additive eductors capable of adding NaOH solution from the chemical additive tank to a containment spray system pump flow to be operable in Modes 1, 2, 3 and 4. With the spray additive system inoperable, restore the system to operable status within 72 hours or be in at least hot standby within the next six hours..."

Contrary to the above, on September 19, 1983, Unit 2 in cold shutdown (Mode 5), the licensee found containment spray loop 2A eductor supply valve No. V019A locked in the closed position. This rendered the "A" train of this system inoperable. The licensee did not have documentation to verify that the valve had been closed after

8401050606 831216
PDR ADOCK 05000348
Q PDR

the reactor reached Mode 5. The last procedural operation of the valve was on August 21, 1983, at the conclusion of surveillance testing while the reactor was in Mode 1. Therefore, the above limiting condition for operation was exceeded. The "B" train of the spray additive system was operable and capable of performing its intended safety function."

Admission or Denial

The above violation occurred as described in the subject report.

Reason for Violation

This violation was caused by procedural inadequacy in that the existing procedure allowed verification of the locked open position by moving the valve in the closed direction without removing the locking mechanism. Investigation revealed that this method could lead to an incorrect conclusion about valve position for reach rod operated valves.

Corrective Actions Taken and Results Achieved

Since the unit was in Mode 5 (valve not required to be locked open), the correct valve position was documented and shutdown operations continued. An extensive investigation was conducted to determine the cause of the improper position.

Corrective Steps Taken to Avoid Further Violations

FNP-O-AP-16 (Conduct of Operations - Operations Group) was revised to require that the locking device be removed prior to verifying the open position of a locked valve. All Operations personnel were trained on this change. These actions were completed by 10/13/83.

Date of Full Compliance

September 19, 1983.

"B. Technical Specification 6.8.1.c requires that written procedures shall be established, implemented, and maintained covering surveillance and test activities of safety related equipment.

Contrary to the above, a necessary Temporary Change Notice (TCN) was not incorporated in FNP-2-STP-21.1, Main Steam Line Isolation and Bypass Valve Inservice Test on June 4, 1983. Thus, the procedure as written was inadequate."

Mr. R. C. Lewis
December 7, 1983
Page Three

Admission or Denial

The above violation occurred as described in the subject report.

Reason for Violation

This violation was caused by personnel error in that FNP-2-STP-21.1 (Main Steam Line Isolation and Bypass Valve Inservice Test) had not been revised to allow verification of valve movement by local observation.

Corrective Actions Taken and Results Achieved

FNP-2-STP-21.1 was revised to allow local observation as a method of verifying valve movement. The appropriate personnel have been counseled concerning this violation.

Corrective Steps Taken to Avoid Further Violations

See above.

Date of Full Compliance

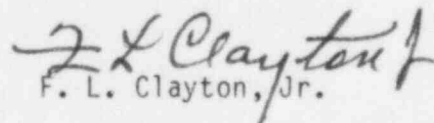
June 23, 1983.

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.

Yours very truly,


F. L. Clayton, Jr.

FLCJr/KWM:nac/G-21

xc: File