



Dave Morey  
Vice President  
Farley Project

Southern Nuclear Operating Company

May 31, 1995

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 the Notice of Violation (VIO)  
NRC Inspection Report Nos. 50-348/95-08 and 50-364/95-08

Ladies and Gentlemen:

As requested by your transmittal dated May 2, 1995, this letter responds to VIO 50-364/95-08-04, "Loss of Personnel and Material Control in the Unit 2 SFP CRAB." The Southern Nuclear Operating Company (SNC) response to VIO 50-364/95-08-04 is provided in the Attachment.

In addition, the subject inspection report included VIO 50-364/95-08-03, "Inadequate Tagging Order Preparation and Execution." In order to facilitate a more thorough root cause evaluation of this event, SNC requested a one week extension for response submittal. This extension to June 8, 1995, was granted by Mr. John Johnson of NRC Region II by telephone conference with Mr. B. L. Moore of SNC on May 26, 1995.

Respectfully submitted,

Dave Morey

EFB:maf 95-08-04.DOC  
Attachment

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

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 31<sup>st</sup> DAY OF May, 1995

Martha Gayle Dow  
Notary Public

My Commission Expires: November 1, 1997

ATTACHMENT

RESPONSE TO VIO 50-364/95-08-04

## RESPONSE TO VIO 50-364/95-08-04

### **VIO 50-364/95-08-04 states the following:**

Technical Specification 6.8.1.a requires that applicable written procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, 1978, shall be established, implemented and maintained. Appendix A, Section 2.k., recommends general plant operating procedures for "Preparation for Refueling and Refueling Equipment Operation."

Administrative Control Procedure 7.0, "Foreign Material Control In Fuel Handling Areas And Spent Fuel Pool Material Storage," Section 5.1 requires that all individuals entering a controlled refueling area boundary (CRAB) are responsible for securing their own loose articles. Furthermore, each individual is also responsible for logging their entry and exit of the area, unless an access control point monitor is stationed.

Contrary to the above, on April 3, 1995, two individuals entered the Unit 2 spent fuel pool (SFP) controlled refueling area boundary without logging themselves in. A number of loose articles (e.g., rags, wire clippers) were identified on the spent fuel pool bridge crane that were not properly secured. Additionally, a number of improper/incomplete log entries made in the Personnel and Material Accountability Log during the previous two weeks were identified. The licensee had not stationed an access control point monitor at the Unit 2 SFP.

### **Admission or Denial**

The violation occurred as described in the Notice of Violation.

### **Reason for Violation**

Personnel error in that individuals failed to follow procedural requirements to properly update the Personnel and Material Accountability Log when entering and exiting the SFP-CRAB. Additionally, personnel failed to exercise good work practices in the handling of loose articles while working in the area.

### **Corrective Actions Taken and Results Achieved**

1. Upon discovery of this condition, the Shift Supervisor and Engineering Support Supervisor were notified and an inspection and inventory of the SFP-CRAB was performed. Discrepancies in the Personnel and Material Accountability Log were reconciled.
2. A continuous CRAB Access Control Point monitor was established in the SFP Room for the duration of the fuel inspection activities.

3. An inspection of the SFP was performed utilizing underwater camera equipment to confirm that lost articles had not been introduced into the SFP.
4. The SFP-CRAB control provisions of procedure FNP-0-ACP-7.0 were reviewed with Westinghouse refueling/fuel inspection, Engineering Support Reactor Engineering, Health Physics and Chemistry personnel involved. These individuals were re-instructed on the importance of adherence to procedure provisions.

**Corrective Steps to Avoid Further Violation**

1. Personnel authorized security access to the spent fuel pool will be re-instructed on the SFP-CRAB Personnel and Material Accountability provisions of FNP-0-ACP-7.0, with particular emphasis placed on logging requirements and on the importance of foreign material control with respect to the potential damage to fuel assemblies. Provisions will be established to ensure initial training and periodic retraining are conducted for individuals having access to the SFP.
2. FNP-0-ACP-7.0 will be revised to add provisions for assessment of the work scope by the responsible work group and, when deemed necessary, to establish a SFP-CRAB Access Control Point Monitor. The duties of this monitor will be similar to and provide the positive controls of the Containment CRAB.

**Date of Full Compliance**

July 31, 1995