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Southern Nuclear Operating Company

September 11, 1995

*the southern electric system*

Docket Number: 50-364

10 CFR 2.201

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)  
NRC Inspection Report Nos. 50-348/95-13 and 50-364/95-13

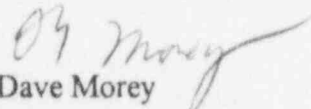
Ladies and Gentlemen:

As requested by your transmittal dated August 15, 1995, this letter responds to VIO 50-364/95-13-01, "Missed Technical Specification Surveillance Requirement 4.4.9". The Southern Nuclear Operating Company (SNC) response to VIO 50-364/95-13-01 is provided in the Attachment.

Confirmation

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

Respectfully submitted,

  
Dave Morey

DPH:maf VIO13-01.DOC

Attachment

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

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ATTACHMENT

RESPONSE TO VIO 50-364/95-13-01

VIO 50-364/95-13-01 states the following:

Technical Specifications (TS) Surveillance Requirement 4.4.9, requires the licensee to determine the specific activity of the primary coolant pursuant to the sample and analysis program described by Table 4.4-4. Item 4.b of this TS table prescribes that an isotopic analysis of Iodine shall be performed between 2 and 6 hours following a thermal power change greater than 15% of rated power within an hour.

Contrary to the above, the licensee did not complete its isotopic analysis of reactor coolant iodides until the 11th hour after the rapid ramp down of Unit 2 from 100% power to 60% power, that occurred in less than an hour, on June 21, 1995.

Admission or Denial

The violation occurred as described in the Notice of Violation.

Reason for Violation

Cognitive personnel error in that the responsible Chemistry personnel failed to identify that the conditional surveillance was required. One person relied on memory rather than review applicable procedures. Other personnel relied on the decision of the first person.

Additional Information

At 1100, on June 22, 1995, with Unit 2 in mode 1, operating at approximately 64 percent reactor power, it was determined that a portion of Technical Specification surveillance requirement 4.4.9 was not met. Specifically, analysis of the Reactor Coolant System Dose Equivalent Iodine (DEI) analysis was not performed within the specified time. DEI analysis is required between two and six hours following a thermal power change exceeding 15 percent of the rated thermal power (RTP) within a one hour period. At 2102 on June 21, 1995, while operating at 100 percent power, a power reduction was commenced which exceeded 15 percent RTP within a one hour period. DEI analysis was required between 2307 on 6/21/95 and 0307 on 6/22/95 and was not completed until 0822 on 06/22/95.

Operations personnel appropriately notified Chemistry personnel of the power change and to perform the "increased sampling requirements" per their operating procedure. Chemistry supervision was on shift due to a sodium problem in the secondary system which had begun in April 1995. There were discussions between the evening shift and night shift chemistry foremen and Shift Radiochemists regarding the sampling requirements. Other chemistry personnel were knowledgeable of the power change and had an opportunity to aid in identifying the DEI requirement.

This violation involved only the Chemistry group. The event is considered an isolated event. Power changes of greater than 15 percent RTP within one hour, for both units for the last two years, were reviewed. DEI analysis was completed every time Technical Specification surveillance 4.4.9 was required.

**Corrective Actions Taken and Results Achieved**

1. The DEI analysis was performed on 6-22-95 at 0822 and the results showed no evidence of iodine peaking.
2. The individual components of the DEI analysis were back decayed to 2307 on 06/21/95. The DEI analysis calculated from these new results was within specification.

**Corrective Steps to Avoid Further Violation**

1. Chemistry personnel involved in this event have been reinstructed on this conditional surveillance.
2. Group meetings have been held to brief Chemistry personnel on this event.
3. As an enhancement, Chemistry and Operations procedures have been revised to provide additional guidance concerning sampling requirements due to power transients.

**Date of Full Compliance**

August 25, 1995