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*the southern electric system*

December 19, 1995

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 Notice of Violation (VIO)  
NRC Inspection Report Nos. 50-348/95-18 and 50-364/95-18

Ladies and Gentlemen:

As requested by your transmittal dated November 21, 1995, this letter responds to VIO 50-348, 364/95-18-01, "Inoperable Control Room Pressurization Unit Humidistats", VIO 50-348, 364/95-18-03, "Uncontrolled Use of Non-Temperature Compensated Heise Gauges", and VIO 50-348, 364/95-18-05, "Failure to Follow Procedures, Multiple Examples". The Southern Nuclear Operating Company (SNC) responses to these violations are provided in Attachment 1, Attachment 2, and Attachment 3, respectively.

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 1

RESPONSE TO VIO 50-348, 364/95-18-01

VIO 50-348, 364/95-18-01 states the following:

The Limiting Condition for Operation for TS 3.7.7 requires that two independent control room emergency air cleanup systems shall be operable for all modes of operation.

Contrary to the above, the licensee confirmed on September 8 and 26, 1995 that the charcoal filter heater humidity controllers for the A and B trains, respectively, of the control room pressurization units were inoperable, and had been for an indeterminate period of time. A licensee self-initiated safety system assessment of the normal and emergency control room ventilation systems had identified on August 9 that the pressurization unit humidistats were not included in any preventive maintenance or surveillance test program. Furthermore, no records existed to show that these humidistats had ever been calibrated since Units 1 and 2 were licensed.

#### **Admission or Denial**

The violation occurred as described in the Notice of Violation.

#### **Reason for Violation**

The reason for this violation was procedural inadequacy. The moisture controllers were not included in the periodic preventative maintenance program. This event was reported per LER 95-007-00 (Unit 1).

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

1. Both trains of the control room pressurization units heater hand switches were placed in a configuration that would actuate the associated pressurization unit heaters coincident with a fan start, regardless of intake air temperature or relative humidity.
2. PM tasks have been created to perform calibrations on a vendor recommended frequency.
3. Moisture controllers for both trains were replaced and calibrated satisfactorily.

#### **Corrective Steps That Will Be Taken to Avoid Further Violation**

Corrective steps to avoid further violation are complete. (The steps are discussed above and in LER 95-007-00 (Unit 1).)

#### **Date of Full Compliance**

Compliance was achieved on December 1, 1995.

ATTACHMENT 2

RESPONSE TO VIO 50-348, 364/95-18-03

VIO 50-348, 364/95-18-03 states the following:

Technical Specification (TS) 6.8.1.a required that applicable written procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978, shall be established, implemented, and maintained. Regulatory Guide 1.33, Appendix A, Section 8.a, recommends that procedures of a type appropriate to the circumstances should be established to ensure that gauges, instruments, controls and other measuring and testing devices are properly controlled, calibrated and adjusted at specified periods to maintain accuracy. Step 4.1.3 of Administrative Procedure FNP-0-AP-11, Control and Calibration of Test Equipment, Test Instrumentation and Plant Instrumentation, Revision 9, required that a restricted use tag be placed on any instrument requiring special precautions in its plant usage. The tag will show instrument identification and list special restrictions on instrument usage.

Contrary to the above, restrictions associated with the use of the non-temperature compensated test gauges utilized to calibrate the pressurizer pressure transmitters on September 22 and March 29, 1995 in Units 1 and 2 respectively, were not provided to personnel performing the calibrations. As a result, temperature corrections were not applied to test gauge readings as required. Recent main steam safety valve setpoint testing in Units 1 and 2 and reactor coolant system flow transmitter calibrations in Unit 1 were additional examples where restrictions associated with the use of non-temperature compensated test gauges were not provided.

#### **Admission or Denial**

The violation occurred as described in the Notice of Violation.

#### **Reason for Violation**

The reason for this violation was personnel error. I&C supervision failed to properly implement portions of requirements set forth in FNP-0-AP-11 as it applies to labeling test instruments when special use restrictions apply.

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

1. The Heise test pressure gauges in the calibration lab have been inventoried and labeled according to their temperature compensation status. The Heise test pressure gauges that are not temperature compensated that remain in use have "Restricted Use" tags attached.
2. Applications where non-temperature compensated pressure gauges were utilized during surveillance testing, in-service inspection, system testing and instrument calibrations for the most recent refueling outages on Unit 1 and Unit 2 were either recalibrated or evaluated for acceptability. Instruments evaluated were found acceptable.

**Corrective Steps That Will Be Taken to Avoid Further Violation**

1. A complete review of different types of test gauges for temperature compensation requirements will be performed. "Restricted Use" tags will be attached as appropriate.
2. I&C personnel will be trained on the details of this CAR.

**Date of Full Compliance**

March 31, 1996

ATTACHMENT 3

RESPONSE TO VIO 50-348, 364/95-18-05

VIO 50-348, 364/95-18-05 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, dated February 1978, shall be established, implemented and maintained. Appendix A, Section 1.d recommends administrative procedures on adherence and temporary change to procedures.

FNP-0-AP-6, "Procedure Adherence," Revision 2, establishes provisions for assuring adherence to safety-related plant procedures. Deviations from plant procedures shall not be permitted except under emergency conditions or as allowed by an approved temporary change notice (TCN).

Contrary to the above, from September 16 through October 4, 1995, four examples of failure to follow written procedures occurred as follows:

- On October 4, following the exigent shutdown of Unit 2 in accordance with FNP-2-UOP-2.1, Revision 16, "Shutdown of Unit From Minimum Load to Hot Standby," plant operators had not initialed and dated the steps listed in Section 2.0, "Initial Conditions."
- On October 3, prior to filling and pressurizing the Unit 1 Chemical Volume and Control System in accordance with FNP-0-PMP-505, Revision 14, "System Inservice and Hydrostatic/Pneumatic Testing," the test supervisor failed to complete the hydrostatic test valve lineup and did not signoff the test sequence and data sheets.
- On September 22, during preparations to lift the Unit 1 upper internals in accordance with FNP-1-MP-1.0, Revision 24, "Maintenance Refueling Procedure," maintenance personnel inspected and lubricated the internals lifting rig in a manner and sequence different than that prescribed without using a TCN.
- On September 16, during Unit 1 surveillance testing in accordance with FNP-1-STP-21.2, Revision 7, "MSIV Air System Leak Test," a system operator did not follow the prescribed valve alignment steps in a precise manner and failed to initial steps as they were accomplished.

#### **Admission or Denial**

The violation occurred as described in the Notice of Violation.



### **Reason for Violation**

The reason for this violation is personnel error in that personnel failed to perform procedures as written. The personnel involved deviated from procedures in a manner that is not identified as permissible per FNP-0-AP-6, Procedure Adherence. Expectations of procedural adherence has been insufficiently reinforced by supervision and management.

This problem is generic in nature in that it involved personnel from several different work groups. The procedure adherence problems identified are specific to weaknesses with performance of tasks normally performed with procedures in hand or readily available during performance. Through review of various other procedure performance related incidents over the last three years, and the incidents cited herein, characteristic weaknesses identified are:

- Not performing a step when there is no allowance for non-performance identified within the procedure or no provision for identifying the step as not applicable.
- Not signing off each step as it is performed, and the procedure does not specify that this is allowed.
- Not performing steps in the designated sequence, and the procedure does not specify that this is allowed.
- Performing actions that are not in direct compliance with the procedure as written.

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

1. The Initial Conditions of FNP-2-UOP-2.1 were met and signed by 1915, prior to mode 3 entry at 1918, and prior to rods being fully inserted and opening of reactor trip breakers at 1936. FNP-1(2)-UOP-2.1 and FNP-1(2)-UOP-3.1 will be revised to clearly identify the initial conditions which must be completed prior to entry into the procedure. Procedure adherence expectations concerning this event have been discussed with the Shift Supervisor involved.
2. The open vent valves were closed by a System Operator to stop the discharge of water. The valve line up for the hydrostatic test was performed and verified per the procedure prior to continuing with the test. Procedural adherence expectations concerning this event were discussed with the individual involved.
3. A one time only TCN was written to address the non-performance of the lifting rig engaging threads lubrication and inspection. Procedural adherence expectations concerning this event were discussed with the individuals involved. FNP-1(2)-MP-1.0 was revised to facilitate performance of the upper internals lifting rig inspection earlier in the procedure to better accommodate the outage schedule.

4. The air supplies to the loop A MSIVs were vented and the MSIVs closed properly at approximately 1013. Extensive testing and maintenance were conducted on the loop A MSIV instrument air system and solenoid valves as part of a root cause investigation. No equipment failures that would have contributed to this event were evident. Expectations associated with appropriate procedure performance were discussed with the individual involved. The Unit 1 and 2 test procedures have been modified to prevent testing on more than one MSIV on a loop at a time in conditions where MSIVs are required operable.

**Corrective Steps That Will Be Taken to Avoid Further Violation**

Supervision and management will reinforce expectations of procedural adherence, with emphasis on the requirement to perform all procedure steps and initial conditions, to perform procedures on a step by step basis, to document performance in sign-off steps as each step is performed, and to perform procedures as written or take action to correct problems identified with procedures as written.

**Date of Full Compliance**

February 29, 1996