



J. D. Woodard
Vice President
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Southern Nuclear Operating Company

the southern electric system

June 30, 1992

Docket Nos. 50-348
50-364

10 CFR 2.201

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

Joseph M. Farley Nuclear Plant
Reply to Notice of Violation
Report Number 50-348, 364/92-13
Item Number 50-348, 364/92-13-01
NRC Inspection of April 27 - May 1, 1992

Gentlemen:

This letter refers to the violation cited in the subject inspection report. The violation states:

Amendment Numbers 93 dated March 31, 1992, and 87 dated April 1, 1992, facility operating license NPF-2 and NPF-8, respectively, requires the licensee to comply with their approved Physical Security Plan.

Revision 22, dated March 13, 1990, of the Physical Security Plan (PSP), Section 2.4.1, Training/Retraining, Security Personnel, states in part, "Initial training and requalification of security personnel shall be conducted in accordance with the provisions of the FNP Security Personnel T&Q Plan."

Revision 6, dated March 13, 1992, of the T&Q Plan, Section 2.2, states in part, "Security Supervision will certify on each SNC or contractor guard's qualification and requalification record that the performance of all crucial tasks associated with his assigned duties have been successfully demonstrated that such records will contain the date of successful performance." Section 2.3, of the T&Q Plan states in part, "All Farley Nuclear Plant Security Guards will be requalified every twelve (12) months in accordance with their job related tasks."

Contrary to the above, security supervision was certifying on SNC requalification records that they had successfully demonstrated all critical tasks associated with their assigned duties when in fact, they were not witnessing the guard demonstrated the task on the dates of performance. During 1991 and 1992, personnel were responsible for conducting annual requalification were not requiring security officers to demonstrate all critical tasks as required.

This is a Security Level IV violation (Supplement III).

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 training tasks requiring demonstrated performance were signed off based on previous observation rather than requiring the officers to demonstrate performance on the certification date.

Corrective Action Taken and Results Achieved

To alleviate adverse condition: The security force was evaluated and it was determined that the security officers were fully qualified to perform assigned duties.

Corrective Steps to Avoid Further Violations

1. Security group examiners have received training stating they shall ensure the Training and Qualification Plan Tasks requiring "demonstrated performance" are actually performed in their presence. The retraining has been documented by signatures appearing on a training attendance sheet.
2. A three-day formal training class, to be administered by the plant training staff and the security training coordinator is scheduled for July 8, 9, 10, 1992. All security shift foremen will attend. A portion of the training will include "conducting demonstrated performance evaluations."
3. The Security Personnel Training and Qualification Plan will be revised to require knowledge skills to be evaluated in a written examination and performance skills to be evaluated through actual demonstration.

Date of Full Compliance

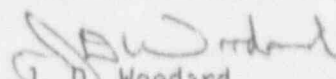
July 31, 1992

Confirmation

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.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY


J. D. Woodard

JDW/SMA/EFB:map.d

cc: Mr. S. D. Ebner
Mr. S. T. Hoffman
Mr. G. F. Maxwell