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**Alabama Power**  
*the southern electric system*  
August 30, 1984

Docket No. 50-348  
Docket No. 50-364

Mr. D. M. Verrelli  
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  
June 25 - June 29, 1984**

**RE: Report Numbers 50-348/84-18  
50-364/84-18**

Dear Mr. Verrelli:

This letter refers to the violation, cited in the subject inspection reports, which states:

"The following violation was identified during an inspection conducted on June 25-29, 1984. The Severity Level was assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

Technical Specification 6.11 requires that procedures for personnel radiation protection shall be adhered to for all operations involving personnel radiation exposure.

Contrary to the above, procedures for personnel radiation protection were not adhered to as follows:

- a. Although licensee procedure FNP-0-RCP-740, paragraph 8.8 requires that evaluations of TLD and pocket ion chamber dosimeters be performed for discrepancies greater than 30 percent and 100 millirem, no such evaluations had been performed by the licensee for identified TLD and dosimeter discrepancies during the period October, 1983 to June, 1984.

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- b. Although licensee procedure FNP-0-RCP-112, section 9.0 requires that maintenance for the containment breathing air system be performed in accordance with the vendor installation and operating instruction, the licensee had not performed annual filter replacement on the containment breathing air system as specified by the vendor instruction since the units were first operated in June, 1980 for Unit 1 and October, 1982 for Unit 2.
- c. Although licensee procedure FNP-0-RCP-28, paragraph 4.1 requires that all personnel frisk after exiting a contamination control zone, two licensee employees who exited a contamination control zone on the 155 foot elevation of the Unit 1 auxiliary building did not perform a whole body frisk.

This is a Severity Level IV violation (Supplement IV)."

#### Admission or Denial

The above violation occurred as described in the subject reports.

#### Reason for Violation

- 1) The first part of this violation was caused by personnel error. Because of other priority work, supervision made a decision to defer these evaluations. However, no procedure change was accomplished to document this decision nor was a tracking system established to ensure that the evaluations were performed when the priority work was reduced.
- 2) The second part of this violation was caused by a procedural inadequacy in that there was no procedural guidance on preventive maintenance. FNP-1-RCP-112 referenced the vendor technical manual for maintenance. The FNP Staff interpreted this requirement to require corrective maintenance only. Since the vendor manual discussed preventive maintenance based on a different service usage than that experienced at Farley Nuclear Plant, contact had been made with the vendor concerning his recommendation for Farley service usage. However, this guidance was not placed in a procedure.
- 3) The third part of the violation was caused by personnel error in that decontamination personnel failed to frisk upon exiting the decontamination room.

#### Corrective Action Taken and Results Achieved

- 1) The discrepancies from October 1983 to June 1984 will be evaluated and resolved by October 31, 1984.

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- 2) Specific preventive maintenance information for the FNP service usage of the breathing air system was requested and received from the vendor. The technical manual has been updated to reflect this information.
- 3) Decontamination personnel in the applicable work group were frisked immediately and no contamination was found.

Corrective Steps Taken to Avoid Further Violations

- 1) Procedural adherence in all aspects of personnel dosimetry has been emphasized by reinstruction of supervision. A Dosimetry Foreman has also been added to ensure consistent supervisory attention is applied to dosimetry operations.
- 2) A preventive maintenance task sheet has been written for the breathing air system on each unit. Procedures have been revised to provide operational checks of dessicant and filters.
- 3) Decontamination personnel in the applicable work group were disciplined.

Date of Full Compliance

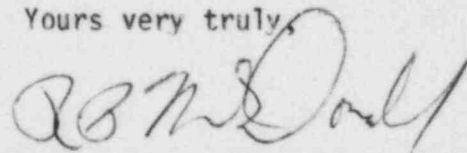
October 31, 1984.

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,



R. P. McDonald

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