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R. P. McDonald
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85 SEP 23 4 9: 28



September 17, 1985

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 30323

SUBJECT: J. M. Farley Nuclear Plant NRC Inspection of
July 10 - 12, 1985

RE: Report Numbers 50-348/85-30
50-364/85-30

Dear Mr. Verrelli:

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

"The following violation was identified during an inspection conducted on July 10 - 12, 1985. The Severity Level was assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

10 CFR 50, Appendix B, Criterion V, and the accepted QA program (FSAR 17.2.5) collectively require that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures. Administrative Procedure FNP-0-AP-63, Conduct of Operation - System Performance Group, Revision 1 requires surveillance test evaluation. The accepted QA program commits to ANSI N18.7 1972, Administrative Controls for Nuclear Power Plants. Section 6.2.2 requires that test results be evaluated to determine whether the individual tests demonstrate that the plant can be operated safely and as designed. Section 4.2.2 of FNP-0-AP-63 implements the evaluation requirement.

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Contrary to the above, surveillance test evaluations were not always being performed. A review of 165 completed surveillance tests selected by the licensee and the NRC inspector for multiple types of safety-related pumps indicated that evaluations had not been performed for 35 of those tests.

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

Admission or Denial

Alabama Power denies the alleged violation.

The violation is invalid because the cited deficiency involves a Company requirement that is not also a license requirement. This Company requirement is for additional reviews and evaluations of selected, previously reviewed surveillance test results. Specifically, the 35 tests cited had been satisfactorily completed and the results reviewed as required by our Administrative Procedure FNP-O-AP-5. Completed reviews of these 35 test results satisfied all of the following: FNP-O-AP-5; general license requirements such as 10CFR50 Appendix B; our accepted QA program (FSAR 17.2.5); the criteria of ANSI N 18.7 1972; and all licensing commitments.

We have numerous Company requirements that go beyond regulatory requirements. The one cited is specified in our Administrative Procedure FNP-O-AP-63, paragraph 4.2.2. Principally, it involves independent trending of certain parameters from selected surveillance test data. There is no license requirement for this additional level of review and analysis.

Alabama Power Company also denies the assigned level of the alleged violation.

The "Severity Level IV" assignment made from Supplement I to 10CFR Part 2, Appendix C does not correlate to any of the examples listed in Section D.

Reason for Violation

Not Applicable

Corrective Action Taken and Results Achieved

Not Applicable

Corrective Steps Taken to Avoid Further Violations

Not Applicable

Mr. D. M. Verrelli
September 17, 1985
Page Three

Date of Full Compliance

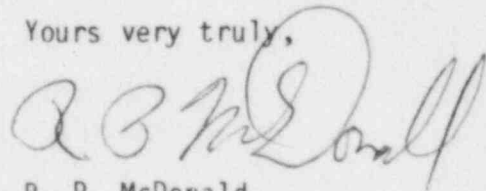
Not Applicable

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,

A handwritten signature in cursive script, appearing to read "R. P. McDonald". The signature is written in dark ink and is positioned above the printed name.

R. P. McDonald

RPM:sam

cc: File