

Mailing Address

Alabama Power Company
600 North 18th Street
Post Office Box 2641
Birmingham, Alabama 35291
Telephone 205 783-6090

R. P. McDonald
Senior Vice President
Flintridge Building

05 SEP 30



Alabama Power

electric system

September 26, 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 29 - August 2, 1985

RE: Report Numbers 50-348/85-33
50-364/85-33

Dear Mr. Verrelli:

This letter refers to the violations cited in the subject inspection reports which state:

"The following violations were identified during an inspection conducted on July 29 - August 2, 1985. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. 10 CFR 50, Appendix B, Criterion X, as implemented by paragraph 17.2.10 of the Farley FSAR, requires, in part, that a program for inspection of activities affecting quality be established and implemented to verify conformance with procedures and that inspections be performed by individuals other than those who performed the activity being inspected. 10 CFR 50.55a(g) requires, in part, that components classified as ASME Code classes 1, 2, and 3 meet the requirements set forth in ASME Section XI. Paragraph IWA-4000 of the 1974 Edition of ASME Section XI requires that a QA program (NA-4000) be documented and maintained for repairs and modifications. Paragraph NA-4133.10 of subsection NA of the [1974] Edition of ASME Section III requires that in-process inspections be performed to assure conformance with procedures and that the inspections be performed by persons other than those who performed the activity being examined. In addition, such persons are not to report directly to the immediate supervisors who are responsible for the work to be performed.

8510070349 850926
PDR ADOCK 05000348
PDR
G

IE01 1/0

Paragraph 17.2.10 of the FSAR requires, in part, that maintenance activity inspections include the original inspection requirements, including visual examinations to determine material and assembly integrity, cleanliness, critical dimensions, and compliance with work procedures.

Contrary to the above, activities affecting quality were not independently in-process inspected to assure compliance with procedures in that class 1 and 2 pipe welds covered by Maintenance Work Request Nos. 94322, 88067 and 84604 did not receive the independent in-process inspections (fit-up, final visual, etc.) performed on the original welds.

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

2. 10 CFR 50, Appendix B, Criterion V, as implemented by Section 17.2.5 of the Farley FSAR, requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, and drawings and shall be accomplished in accordance with these instructions, procedures and drawings. Paragraph 3.6.1 of procedure ISI-8, Revision 07, the applicable procedure for visual inservice inspection (ISI) of class 1 and 2 pipe supports, requires that hangers having calibrated load indicators have the scale reading recorded. Paragraph 4.10 of procedure FNP-1-STP-157.0, Revision 1, the applicable procedure for control of ISI, requires that support settings of constant and variable spring type hangers be verified.

Contrary to the above, during the last outages, activities affecting quality were not accomplished in accordance with prescribed procedures in that, for Class 2 pipe support spring hangers "A" on ISO ALA-221 and "F" on ISO ALA-218, the support settings were not recorded and verified.

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

Admission or Denial

The above violations occurred as described in the subject report.

Reason for Violation

1. The first violation was caused by procedural inadequacy in that the Welding Manual does not contain the procedural guidance to perform original in-process inspections or equivalent alternatives.

2. The second violation was caused by personnel error in that the inspection personnel failed to identify the setting on the spring hangers, and in that supervision performing the review of the data failed to notice the omission. In addition, the procedure did not lend itself to proper review in that there are no blanks on the data sheet to record support settings.

Corrective Action Taken and Results Achieved

1. An engineering evaluation will be performed to determine the acceptability of the welding activities performed on MWRs 94322, 88067 and 84604. In addition, a records search will be conducted to determine the pipe welds performed by the Maintenance Group on other Class I, II and III systems. Once identified, each activity will be evaluated to determine acceptability.
2. The spring hangers settings will be verified during the next refueling outage. This is considered to be an isolated incident since an additional review of all the hanger data sheets from the Unit 1 outage failed to identify any additional problems.

Corrective Steps Taken to Avoid Further Violations

1. The new Welding Manual that is to be implemented later in 1985 will have procedural guidance to perform in-process inspection. All personnel performing welding activities, including supervisory personnel, will be trained on the new Welding Manual prior to implementation.
2. Individuals involved in data collection and review will be re-instructed on the necessity of procedure adherence and proper review. The procedure will be revised to facilitate data review.

Date of Full Compliance

First violation - 12-15-85
Second violation - 12-1-85

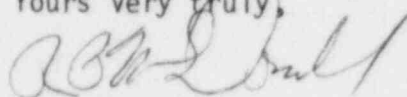
Affirmation

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

Mr. D. M. Verrelli
September 26, 1985
Page Four

The information contained in this letter is not considered to be of a proprietary nature.

Yours very truly,

A handwritten signature in dark ink, appearing to read "R. P. McDonald", written in a cursive style.

R. P. McDonald

RPM:sam
cc: File