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Alabama Power
the southern electric system

October 21, 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 50-348/85-32
50-364/85-32

Dear Mr. Verrelli:

This letter refers to the violations cited in the subject inspection reports. Based on discussions on October 17, 1985, with Mr. Roger Walker of your staff, a response to the first violation cited in the subject inspection will be submitted by November 4, 1985. This letter contains a response to the second violation which states:

"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. . . .
2. Technical Specification 6.5.3.1.c requires that proposed tests and experiments which affect plant nuclear safety, and are not addressed in the Final Safety Analysis Report be approved by the plant manager before implementation.

Contrary to the above, measures have not been established to ensure that the requirements of TS 6.5.3.1.c are implemented in that procedure FNP-O-AP-1, Development, Review and Approval of Plant Procedures, Revision 17 does not address that the plant manager has to approve proposed tests and experiments before implementation.

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

Admission or Denial

The second violation occurred as described in the subject report.

Reason for Violation

The second violation was caused by procedural inadequacy in that the requirement for Plant Manager approval for a test or experiment not described in the FSAR was not met explicitly.

Corrective Action Taken and Results Achieved

The 10CFR50.59 annual summaries for 1980 through 1984 and the 1985 PORC minutes have been reviewed to identify those safety evaluations for tests or experiments not described in the FSAR. It has been verified that all such safety evaluations were approved by the PORC Chairman prior to issuance of the associated procedures.

Corrective Steps Taken to Avoid Further Violations

FNP-0-AP-1 will be revised to require the signature of the Plant Manager for any procedure which is classified by its safety evaluation as a test or experiment not described in the FSAR.

Date of Full Compliance

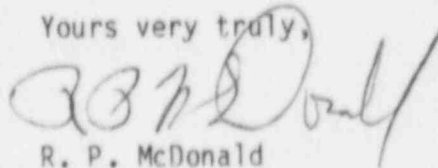
December 31, 1985

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

RPM/KWM:sam
cc: File