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Alabama Power

the southern electric system

June 19, 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 April 15-19, 1985

RE: Report Numbers 50-348/85-21
50-364/85-21

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 April 15-19, 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 XVIII, and the accepted QA Program (FSAR Chapter 17.2.18) collectively state that a comprehensive system of planned and periodic audits shall be carried out. The accepted QA Program commits to ANSI N45.2.12 (Draft 3, Revision 4 dated February 1974), Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants, which states in Sections 4.4 and 4.4.3 that an audit report shall *identify* provide persons contacted during audit activities.

Contrary to the above, audit reports do not *identify* provide persons contacted during the audits. The following are typical examples and are not intended to be all inclusive.

<u>Audit Report No.</u>	<u>Audit Date</u>	<u>Audited Organization Representatives</u>
84/10	3/28 - 4/3/84 4/4 - 4/11/84	Various Technicians Various Technicians

8511040275 850619
PDR ADOCK 05000348
Q PDR

1/1 IE01

84/09	3/5 - 4/3/84	Various Supervisory Personnel
	3/21 - 3/27/84	Various Technicians
	3/26 - 3/30/84	SAER Staff
84-08	3/6 - 3/27/84	Various NNI Personnel
84-07	2/8 - 3/16/84	Various Others
84-02	1/23/84	Various FURMANITE Maintenance Men

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

Admission or Denial

Alabama Power Company denies the alleged violation. The bases for the denial are as follows:

- I. This violation has been classified as a Severity Level V violation. However 10 CFR Part 2, Appendix C defines a Severity Level V violation as having "minor safety or environmental concerns." Alabama Power Company contends that this violation has no safety or environmental concerns; therefore, it is not in-fact a violation as defined in 10 CFR.
- II. The audit reports are in full compliance with ANSI N45.2.12 since the ANSI phrase "persons contacted during the pre-audit, audit, and post audit activities" does not necessarily require that all persons contacted be listed individually by name.

In order to maximize the effective utilization of audit reports while complying with regulatory commitments to the fullest extent, Alabama Power Company contends that "persons contacted" refers to persons who were a source of assistance during the audit or persons with whom meaningful communication occurred concerning potential audit findings. This is generally supervisory and other such key personnel.

As can be seen from the excerpts in Attachment I, the audit reports cited as typical examples did in-fact include specific names and/or phraseology sufficient to identify "persons contacted." (The examples cited in the violation are excerpted from the appropriate audit reports and contained in Attachment I). Audit reports normally list, by name, the personnel contacted. However, the auditors occasionally deem it appropriate to include terms such as "Various Technicians" to indicate that during the

audit, technician level personnel contacted as they were observed either performing or otherwise involved in the activities being audited. In a few limited situations, when a small number of personnel were involved who could be adequately identified by a generic phrase, such phraseology was used. As can be seen in the examples contained in Attachment I, this phraseology better identifies the persons than if their individual names were listed.

Additionally, it is common NRC practice to document "persons contacted" in a manner similar to the method utilized by Alabama Power Company. For instance, the previous two (2) NRC Reports in the Quality Assurance area and fourteen (14) of the nineteen (19) NRC Inspection Reports received by Alabama Power Company in 1985 utilized similar phraseology to document "other" personnel contacted (Appropriate excerpts are provided in Attachment II as examples).

Alabama Power Company is very concerned about the inferences that can be drawn from this citation - those inferences that involve regulatory policies and our mutual professional relationships.

Actions Taken by Alabama Power Company

The use of generalized statements to describe groups of persons contacted during audits will continue to be utilized only where appropriate.

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.

Yours very truly,



R. P. McDonald

RPMc/lw

xc: Mr. L. B. Long
Mr. W. H. Bradford
File A35.97.1

ATTACHMENT I

(ACTUAL EXCERPTS FROM APCo AUDIT REPORTS CITED)

Audit Report 84/10 Audit Date 3/28 - 4/3/84

A. Audit Description

Organization Audited: Farley Nuclear Plant/Newport News Industrial Corporation

General Area Audited: Feedwater Reducer Replacement

Occasion of Audit: Spot

Date(s) of Audit: 3/28/84 - 4/3/84

Audit Team Leader: D. A. Johnson

<u>Principal Sections of Audit</u>	<u>Individual Auditors</u>	<u>Audited Organization Representatives</u>
Pre-Audit Conference	D. A. Johnson J. F. Cheney	L. M. Stinson S. Carmean
Conduct of Audit	D. A. Johnson J. F. Cheney	L. M. Stinson S. Carmean (NNI) Various Technicians
Post-Audit Conference	D. A. Johnson	L. M. Stinson

Audit Report 84/10 Audit Date 4/4 - 4/11/84

A. Audit Description

Organization Audited: Farley Nuclear Plant/Newport News Industrial Corporation

General Area Audited: Feedwater Reducer Replacement

Occasion of Audit: Spot

Date(s) of Audit: 4/4/84 - 4/11/84

Audit Team Leader: D. A. Johnson

<u>Principle Sections of Audit</u>	<u>Individual Auditors</u>	<u>Audited Organization Representatives</u>
Pre-Audit Conference	D. A. Johnson J. F. Cheney	L. M. Stinson S. Carmean

Conduct of Audit	D. A. Johnson J. F. Cheney	L. M. Stinson S. Carmean (NNI) Various Technicians
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Post-Audit Conference	D. A. Johnson	L. M. Stinson
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Audit Report 84/09 Audit Date 3/5 - 4/3/84A. Audit Description

Organization Audited:	Farley Nuclear Plant Staff
General Area Audited:	Corrective Action - Results
Occasion of Audit:	Routine
Date(s) of Audit:	March 5 - April 3, 1984
Audit Team Leader:	R. V. Badham

<u>Principle Sections of Audit</u>	<u>Individual Auditors</u>	<u>Audited Organization Representatives</u>
Pre-Audit Conference	W. G. Ware R. V. Badham C. D. Nichols	W. G. Hairston, III J. D. Woodard All Plant Superintendents
Conduct of Audit	R. V. Badham C. D. Nichols	C. D. Nesbitt L. Huey L. W. Enfinger H. R. Garland Various Supervisory Personnel
Post-Audit Conference	W. G. Ware R. V. Badham	W. G. Hairston, III J. D. Woodard C. D. Nesbitt D. N. Morey R. G. Berryhill W. B. Shipman

Audit Report 84/09 Audit Date 3/21 - 3/27/84A. Audit Description

Organization Audited:	Farley Nuclear Plant/Newport News Industrial Corporation
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General Area Audited: Feedwater Reducer Replacement
Occasion of Audit: Spot
Date(s) of Audit: 3/21/84 - 3/27/84
Audit Team Leader: D. A. Johnson

<u>Principle Sections of Audit</u>	<u>Individual Auditors</u>	<u>Audited Organization Representatives</u>
Pre-Audit Conference	D. A. Johnson J. F. Cheney	L. M. Stinson S. Carmean
Conduct of Audit	D. A. Johnson J. F. Cheney	L. M. Stinson S. Carmean (NNI) Various Technicians
Post-Audit Conference	D. A. Johnson J. F. Cheney	L. M. Stinson

Audit Report 84/09 Audit Date 3/26 - 3/30/84

A. Audit Description

Organization Audited: FNP Staff and Supervisor-Safety Audit & Engineering Review (SSAER) Staff
General Area Audited: Corrective Action & SSAER Activities
Occasion of Audit: Four-Month Interval
Date(s) of Audit: March 26-30, 1984
Audit Team Leader: J. W. McGowan

<u>Principle Sections of Audit</u>	<u>Individual Auditors</u>	<u>Audited Organization Representatives</u>
Pre-Audit Conference	J. W. McGowan	W. G. Hairston, III W. G. Ware Various Supervisors
Conduct of Audit	G. M. Grove R. V. Badham	SSAER Staff

Post-Audit Conference

J. W. McGowan
G. M. Grove

J. D. Woodard
W. G. Ware

Audit Report 84-08 Audit Date 3/6 - 3/27/84

A. Audit Description

Organization Audited: FNP Staff/Newport News Industrial

General Area Audited: Feedwater Reducer Replacement

Occasion of Audit: Spot

Date(s) of Audit: 3/6/84 - 3/27/84

Audit Team Leader: D. A. Johnson

Principle Sections
of Audit

Individual
Auditors

Audited Organization
Representatives

Pre-Audit Conference

W. G. Ware

W. G. Hairston, III
J. D. Woodard
R. G. Berryhill
L. M. Stinson

Conduct of Audit

W. G. Ware
D. A. Johnson
J. F. Cheney

L. M. Stinson
S. Carmean (NNI)
Various NNI
Personnel

Post-Audit Conference

W. G. Ware
D. A. Johnson

L. M. Stinson
S. Carmean (NNI)

Audit Report 84-07 Audit Date 2/8 - 3/16/84

A. Audit Description

Organization Audited: FNP Staff

General Area Audited: Material Control

Occasion of Audit: Routine

Date(s) of Audit: February 8, 1984 - March 16, 1984

Audit Team Leader: R. V. Badham

<u>Principle Sections of Audit</u>	<u>Individual Auditors</u>	<u>Audited Organization Representatives</u>
Pre-Audit Conference	W. G. Ware R. V. Badham C. D. Nichols W. R. Sampson J. F. Cheney	W. G. Hairston, III J. D. Woodard L. W. Enfinger W. B. Shipman D. N. Morey R. G. Berryhill
Conduct of Audit	R. V. Badham W. R. Sampson	L. W. Enfinger W. B. Shipman R. G. Berryhill R. D. Hill L. K. Jones J. E. Garlington H. R. Garland L. M. Stinson R. T. Wood F. G. Watford A. P. Peyer Various Others
Post-Audit Conference	W. G. Ware R. V. Badham D. A. Johnson W. R. Sampson	W. G. Hairston, III J. D. Woodard L. W. Enfinger W. B. Shipman

Audit Report 84-02 Audit Date 1/23/84

A. Audit Description

Organization Audited: FURMANITE

General Area Audited: Valve Repair of Body-to-Bonnet Steam Leak

Occasion of Audit: Spot

Date(s) of Audit: January 23, 1984

Audit Team Leader: J. F. Cheney

<u>Principle Sections of Audit</u>	<u>Individual Auditors</u>	<u>Audited Organization Representatives</u>
Pre-Audit Conference	W. G. Ware G. P. Smith J. F. Cheney	W. G. Hairston, III J. D. Woodard W. B. Shipman

Conduct of Audit

G. P. Smith
J. F. Cheney

Various FURMANITE
Maintenance Men

Post-Audit Conference

W. G. Ware

W. G. Hairston, III

ATTACHMENT II

(EXCERPTS FROM SELECTED NRC INSPECTION REPORTS)

NRC Report Nos. 50-348/83-13 and 50-364/83-11

Report Details

1. Persons Contacted

Licensee Employees

R. Badham, Safety Audit and Engineering Review (SAER) Engineer
B. Bell, Electrical Maintenance Engineer
#R. Berryhill, System Performance and Planning Superintendent
M. Carnley, I & C Sector Supervisor
*D. Culver, SAER Engineer
D. Dozier, Control Technician
#L. Enfinger, Administration Superintendent
#H. Garland, Maintenance Supervisor
*G. Hairston, III, Plant Manager
J. Hudspeth, Document Control Supervisor
L. Jones, IV, Materials Supervisor
*J. McGowan, Manager SAER
#D. Morey, Operations Superintendent
#*C. Nesbitt, Technical Support
#L. Stinson, Plant Modifications Supervisor
L. Ward, I&C Supervisor
#*W. Ware, Supervisor SAER
F. Watford, Fire Marshall
*R. Wiggins, Sector Supervisor Training
*L. Williams, Training Director
#*J. Woodard, Assistant Plant Manager

=> Other licensee employees contacted included operators and office personnel. <=

NRC Resident Inspectors

#W. Bradford, Senior Resident Inspector
*W. Ruhland, Resident Inspector

*Attended exit interview April 29, 1983
#Attended exit interview May 6, 1983

NRC Report Nos. 50-348/80-14 and 50-364/80-16

Report Details

1. Persons Contacted

Licensee Employees

*L. Bailey, OQA Engineer
R. Berryhill, System Performance Superintendent
C. Buck, Staff Engineer

L. Enfinger, Administrative Superintendent
S. Gates, Plant Instructor
*R. George, Engineering and Licensing
*G. Grove, OQA Engineer
G. Hairston, III, Plant Manager
F. Holloway, Shift Supervisor
J. Hudspeth, Document Control Supervisor
K. Jones, Material Supervisor
J. Kale, QA Engineer
D. Mansfield, Startup Superintendent
*R. McDonald, Vice President Nuclear Generation
*J. McGowan, Manager OQA
W. Petty, Manager QA (D&C)
W. Shipman, Maintenance Superintendent
*L. Sims, Supervisor, Nuclear Generation
M. Stinson, System Performance Supervisor
J. Thomas, I&C Supervisor
L. Ward, Startup Supervisor
R. Wiggins, Training Sector Supervisor
J. Woodard, Assistant Plant Manager

=> Other licensee employees contacted included technicians, operators, and office personnel. <=

NRC Resident Inspector

*J. Mulkey

*Attended exit interview

More examples are given below from typical 1985 NRC Inspection Reports in other areas and contain similar language. Here again, the NRC routinely documents audited personnel contacted in much the same manner as Alabama Power Company.

NRC I.E. Report Nos. 50-348/85-22 and 50-364/85-22

1. Persons contacted...
=> ...Other licensee employees contacted included construction craftsmen, engineers, technicians, operators, mechanics, security force members, and office personnel. ... <=

NRC I.E. Report Nos. 50-348/85-19 and 50-364/85-19

1. Persons contacted...
=> ...Other licensee employees contacted included chemistry technicians ... <=

NRC I.E. Report Nos. 50-348/85-18 and 50-364/85-18

1. Persons contacted...
=> ...Other licensee employees contacted included technicians, operations personnel, maintenance and I & C personnel, security force members and office personnel. <=