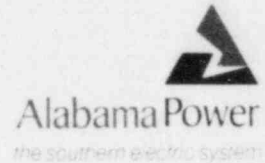


Mailing Address
Alabama Power Company
600 North 18th Street
Post Office Box 2641
Birmingham, Alabama 35291
Telephone 205 783-6090

R. P. McDonald
Senior Vice President
Flintridge Building

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July 2, 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 2 - May 10, 1985

RE: Report Numbers 50-348/85-20
50-364/85-20

Dear Mr. Verrelli:

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

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

1. Technical Specification 3.9.4(b) requires that a minimum of one door in each containment airlock shall be closed during movement of irradiated fuel within the containment.

Contrary to the above, on April 15, 1985, the inner and outer doors of the containment auxiliary hatch were open and unlatched for a period of about four hours while irradiated fuel was being moved.

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

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2. Technical Specification 6.8.1 requires that written procedures shall be established and implemented.

Contrary to the above, procedures were not followed which caused the loss of both residual heat removal (RHR) loops for 52 minutes. Precaution and Limit steps which require the interlock with RHR valves and reactor coolant system pressure to be disabled and inoperative had not been adhered to. This resulted in a 700 psig test signal closing the RHR suction valves and rendering both trains of the RHR system inoperable.

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

3. Technical Specification 3.1.2.3 requires that one charging pump in the boron injection flow path required by Specification 3.1.2.1 shall be operable and capable of being powered from an operable emergency bus in modes 5 and 6.

Contrary to the above, on April 15, 1985, while irradiated fuel assemblies were being removed from the reactor core, there were no charging pumps operable for six hours.

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

4. 10 CFR 50, Appendix B, Criterion II requires that the quality assurance program shall provide control over activities affecting the quality of the identified structures, systems and components.

Contrary to the above, spacers were not installed as required by the vendor's drawings and manuals between the cells of the service water batteries and the uninterruptible power supply batteries to the Units 1 and 2 turbine-driven auxiliary feed pumps. The spacers had not been inserted at the time of the original installation.

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

Admission or Denial

The above violations occurred as described in the subject reports.

Reason for Violation

1. The first violation was caused by personnel error in that the individual failed to operate the containment auxiliary air lock properly.

2. The second violation was caused by procedural inadequacy and personnel error. Power which had been procedurally removed from the valves was incorrectly restored while an auto close signal from the RCS pressure transmitter was present.
3. The third violation was caused by personnel error in that the Shift Supervisor failed to perform a sufficiently detailed review of the tagging order being authorized.
4. The fourth violation was caused by installation error in that spacers were not inserted at the time of the original installation.

Corrective Action Taken and Results Achieved

1. Core alterations were suspended immediately and both auxiliary air lock doors were closed.
2. Power was removed from the two valves and the valves were opened using the local manual operator allowing the RHR pumps to be restarted.
3. Core alterations were suspended and actions were initiated to restore a charging pump to operability.
4. Spacers were installed immediately.

Corrective Steps Taken to Avoid Further Violations

1. The individual involved has been counseled concerning proper utilization of the auxiliary air lock.
2. The procedure for working on the RCS pressure transmitters has been changed to require that the auto close signal be defeated and signed off instead of just stating this as a precaution. The system operating procedure that operators referenced when clearing the tagging order has been changed to say that the breakers may be open when the RCS temperature is less than 180°F. The unit operating procedures have been revised to require a caution tag to be placed on the breakers when the RCS temperature is less than 180°F. The personnel involved have been reinstructed concerning procedural adherence.
3. The Shift Supervisor involved has been counseled.
4. All safety-related batteries were checked to ensure that required spacers were installed. Battery procedures will be revised to periodically inspect the condition of spacers on the uninterruptible power supply, Service Water and Auxiliary Building Batteries.

Mr. D. M. Verrelli
July 2, 1985
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Date of Full Compliance

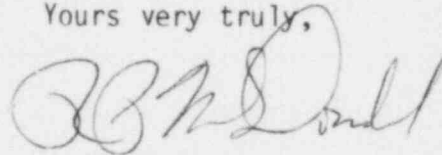
May 15, 1985 (First Violation)
June 25, 1985 (Second Violation)
May 9, 1985 (Third Violation)
July 30, 1985 (Fourth Violation)

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".

R. P. McDonald

RPM:sam/F-2