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Southern Nuclear Operating Company

the southern electric system

Dave Morey
Vice President
Farley Project

November 15, 1996

Docket No.: 50-348
50-364

10 CFR 2.201

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Joseph M. Farley Nuclear Plant
Correction to Reply To a Notice Of Violation (VIO)
NRC Inspection Report Numbers 50-348/96-10 and 50-364/96-10

Ladies and Gentlemen:

On October 25, 1996, Southern Nuclear Operating Company responded to NRC violation (VIO) 50-348, 364/96-10-02, "Failure to Follow a March 14, 1983 Order to Implement And Maintain Commitments for Special Calibration of CHRMs". A paragraph in the response was inadvertently omitted. Attached is the corrected response.

Respectfully submitted,

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Dave Morey

EFB/maf:96-10rev.doc

Enclosures:

Response to VIO 96-10-02

cc: Mr. S. D. Ebnetter, Region II Administrator
Mr. J. I. Zimmerman, NRR Project Manager
Mr. T. M. Ross, Plant Sr. Resident Inspector

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ENCLOSURE 1

VIO 50-348, 364/96-10-02

"Failure to Follow a March 14, 1983 Order to Implement And
Maintain Commitments for Special Calibration of CHRM's"

Enclosure 1

VIO 50-348, 364/96-10-02, "Failure to Follow a March 14, 1983 Order to Implement and Maintain Commitments for Special Calibration of CHRMs" states:

10 CFR 50.54(h) requires, in part, the license to be subject to the provisions of the Act now or hereafter in effect, and to all rules, regulations and orders of the Commission.

By letter dated March 14, 1983, an Order to implement and maintain license commitments for post-TMI related items was issued. The Order referenced commitments documented in letters dated April 16, 1982, and June 4, 1982, issued in response to NRC Generic Letters 82-05 and 82-10, and specified, in part, that Three Mile Island (TMI) Action Item II.F.1-3 was complete.

NUREG 0737, Clarification of TMI Action Plan Requirements, Table II.F.1-3 Containment High Range Monitor, specifies, in part, a monitor range of 1 Roentgen per hour (R/hr) to 10^7 R/hr, and that *in situ* calibration by electronic signal substitution is acceptable for all range decades above 10 R/hr.

Contrary to the above, as of August 12, 1996, the licensee failed to implement and maintain the March 14, 1983 Order, in that, *in situ* special calibration by electronic signal substitution for all range decades above 10 R/hr were not conducted for the installed containment high range monitors.

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

Admission or Denial

The violation occurred as described in the Notice of Violation

Reason for Violation

The cause of this violation was procedural inadequacy in that the implementing procedure did not specify electronic calibration for each decade above 10 R/hr. The FNP calibration procedures developed to fulfill the requirements of NUREG 0737 were written based on the vendor guidance at the time. These procedures perform an isotopic calibration check as well as other electronic calibrations. However, the calibration procedures failed to implement electronic calibration for *each* decade above 10 R/hr.

Enclosure 2

Corrective Steps Taken and Results Achieved

An assessment was conducted concerning the acceptability of the present calibration of the high range containment monitors. The current procedure involves electronic calibrations in combination with a 3-point isotopic calibration. This calibration provides a satisfactory channel calibration and demonstrates the operability of the monitor.

The electronic calibration for each decade above 10 R/hr will be performed at least by the next scheduled surveillance.

Corrective Steps That Will Be Taken to Avoid Further Violation

Procedures for calibration of containment high range monitors will be revised to provide electronic calibration points for each decade above 10R/hr.

Date of Full Compliance

June 1, 1997