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April 10, 1997



Docket No.: 50-348

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

Joseph M. Farley Nuclear Plant - Unit 1
Reply To a Notice Of Violation (VIO)
NRC Inspection Report Number 50-348/97-01

Ladies and Gentlemen:

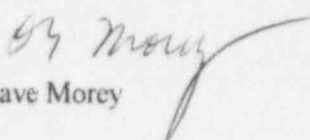
As requested by your transmittal dated March 17, 1997, this letter responds to VIO 50-348, 97-01-01, "Failure to Follow PRF Operability Test Procedure."

The Southern Nuclear Operating Company (SNC) response is provided in the enclosure.

Confirmation

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

Respectfully submitted,


Dave Morey

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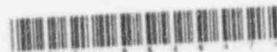
Enclosure

cc: Mr. L. A. Reyes, Region II Administrator
Mr. J. I. Zimmerman, NRR Project Manager
Mr. T. M. Ross, Plant Sr. Resident Inspector

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ENCLOSURE

Response to VIO 50-348, 97-01-01
"Failure to Follow PRF Operability Test Procedure"

RESPONSE TO NOV 50-348/97-01-01

VIO 50-348, 97-01-01, "Failure to Follow PRF Operability Test Procedure" states the following:

Technical Specification (TS) 6.8.1.a requires that applicable written procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978, shall be established, implemented, and maintained. Regulatory Guide 1.33, Appendix A, Section 8.b recommends specific procedures for surveillance tests listed in the TS.

FNP-1-STP-124.0, Penetration Room Filtration Performance Test, Revision 11, implements the testing requirements of TS surveillance requirement 4.7.8.b :

FNP-1-STP-124.0, step 5.0, describes the "Precautions and Limitations" and step 6.0 describes the "Initial Conditions" for the surveillance.

FNP-1-STP-124.0, step 5.4, states "Prior to performing visual inspection of a filtration unit insure that the associated filtration unit fans are de-energized and tagged to prevent starting."

FNP-1-STP-124.0, step 7.4, states in part, "Perform a visual inspection of the applicable components of the system to be tested The inspection check list of Data Package STP-124.0A and are to be used for performing the inspection and indicating items found satisfactorily checked."

Contrary to the above, on January 25, 1997, the test engineer failed to comply with the procedural requirements of FNP-1-STP-124.0 during performance testing of the Unit 1 Penetration Room Filtration system Train A. The following are specific examples:

1. The engineer had signed off step 7.4 as complete even though the internal visual inspection of Data Package STP-124.0A had not been performed.
2. The system was not tagged out as required by step 5.4 prior to performing the visual inspection.
3. The engineer did not sign off steps 5.0 (All precautions and limitations have been read and understood) and 6.0 (All initial conditions are satisfied) prior to commencing the test.

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

Admission or Denial

The violation occurred as described in the Notice of Violation.

Reason for Violation

The reason for the violation was personnel error in that the test engineer failed to follow the test procedure and the test engineer's supervisor failed to discuss his expectations concerning procedural adherence. A contributing factor was that the test engineer had not taken the time to adequately prepare himself for the test. This resulted in an over reliance by the test engineer on the vendor to ensure adequate test performance. The vendor, while knowledgeable about the test and the design requirements of the system, was not familiar with plant specific procedural requirements.

In addition, there were portions of the test procedure that were unclear and could have led other test engineers to misinterpret test requirements.

Corrective Steps Taken and Results Achieved

On February 6, 1997, the revised version of FNI -1-STP-124.0 was satisfactorily re-performed on the Unit 1, Train A, PRF system.

Corrective Steps That Will Be Taken to Avoid Further Violation

Appropriate disciplinary measures have been taken with the supervisor and engineer involved with this occurrence. In addition, coaching has been performed for Engineering Support Department personnel on the lessons learned from this occurrence and on the expectations for test procedure performance.

The PRF surveillance procedures have been revised to provide clarification to the data sheets and procedure sections to minimize the possibility of personnel error in the execution of the procedures.

A broadness review will be conducted on a plant wide basis concerning failure to follow procedure.

Date of Full Compliance

June 1, 1997