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NT-88-0118

R. P. McDonald  
Senior Vice President



March 16, 1988

U. S. Nuclear Regulatory Commission  
Attention: Document Control Des.  
Washington, D. C. 20555

SUBJECT: J. M. Farley Nuclear Plant NRC Inspection of  
December 2-4, 1987

RE: Report Numbers 50-348/87-35-01  
50-364/87-35-01

Dear Sir:

This letter refers to the violation cited in the subject inspection reports which state:

"During the Nuclear Regulatory Commission (NRC) inspection conducted on December 2 - 4, 1987, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violation is listed below:

Technical Specification 6.8.1 requires that written procedures be implemented covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, 1978. Regulatory Guide 1.33, Appendix A includes administrative procedures for procedural adherence and maintenance procedures.

FNP-0-AP-6, Procedure Adherence, and FNP-0-AP-16, Conduct of Operations, require adherence to all plant procedures except under emergency conditions, where adherence to the procedures will create an undue hazard to personnel, equipment, or public health and safety, or under a temporary procedure change. FNP-0-AP-57, Preservice and Inservice Inspections, and FNP-0-AP-5, Surveillance Program Administrative Control, require tests to be performed in accordance with plant procedures.

FNP-0-AP-52, Equipment Status Control and Maintenance Authorization, and FNP-0-AP-5, Surveillance Program Administrative Control, require that directions be provided for the restoration of equipment and systems to service.

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Contrary to the above, on November 27, 1987:

Operations personnel marked initial condition 3.2 of surveillance test procedure (STP) FNP-2-STP-11.6, Residual Heat Removal (RHR) Inservice Test, as not applicable (NA). The licensee departed from the test procedure initial condition which would have required taking "A" RHR train out of service and closing the "A" RHR pump suction isolation valves. This departure occurred under non-emergency plant conditions and was not processed as a temporary procedure change. As a result of the NA on initial condition 3.2, the valve testing was not performed in accordance with the approved test procedure.

Additionally, the licensee failed to provide instructions for the fill and vent of that portion of the RHR "A" train piping between valves 8811A and 8812A prior to its return to service.

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

#### Admission or Denial

The above violation occurred as described in the subject reports.

#### Reason for Violation

The first part of the violation was caused by personnel error in that the Shift Supervisor marked an initial condition of FNP-2-STP-11.6 NA without proper procedural guidance or writing a temporary procedure change. A contributing cause is that no procedural guidance existed previously for performing only a portion of an STP. The second part of the above violation was caused by personnel error in that upon completion of local leak rate testing, the volume between valves 8811A and 8812A was not filled and vented prior to its return to service.

#### Corrective Action Taken and Results Achieved

The normal pressurizer level was restored. The A train RHR system was inspected to ensure that the suspected pressure surge had not resulted in damage to components in the system. The system walkdown determined that no damage had occurred.

#### Corrective Steps Taken to Avoid Further Violations

The Shift Supervisor involved in this event was counseled. Procedural guidance for performing only a portion of an STP has been provided to plant personnel through changes to FNP-0-AP-5. FNP-1/2-STP-627, Local Leak Rate Testing of Containment Penetrations, has been changed to ensure that systems that were drained are filled and vented upon completion of local leak rate testing.

U. S. Nuclear Regulatory Commission  
March 16, 1988  
Page 3

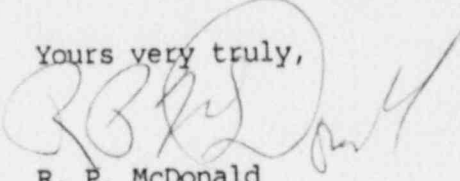
Date of Full Compliance

March 10, 1988

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/emb

cc: Mr. L. B. Long  
Dr. J. N. Grace  
Mr. E. A. Reeves  
Mr. W. H. Bradford