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April 30, 2004

Docket Nos.: 50-348  
50-364



U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555-0001

Joseph M. Farley Nuclear Plant  
Response To Identified Green Non-Cited Violation (NCV)  
NRC Integrated Inspection Report 05000348/2003005 and 05000364/2003005

Ladies and Gentlemen:

As requested by your transmittal dated January 20, 2004, this letter responds to the Green Non-Cited Violation (NCV) described in the transmittal as failure to implement adequate QA procedures to ensure representative sampling of airborne radioactive particulates from the Unit 2 plant vent. By letter dated February 19, 2004, the NRC granted SNC an extended response period for NCV 50-364/03-05-02 until April 30, 2004. The Southern Nuclear Operating Company (SNC) response is provided in the enclosure.

This letter contains no NRC commitments. Should you have any questions, please advise.

Sincerely,

A handwritten signature in black ink, appearing to read "L. M. Stinson", is written over a horizontal line.

L. M. Stinson

LMS/LPH/sdl

Enclosure: SNC Response to NCV 50-364/03-05-02

cc: Southern Nuclear Operating Company  
Mr. J. B. Beasley, Jr., Executive Vice President  
Mr. D. E. Grissette, General Manager – Plant Farley  
RTYPE: CFA04.054; LC# 14008

U. S. Nuclear Regulatory Commission  
Mr. L. A. Reyes, Regional Administrator, Region II  
Mr. S. E. Peters, NRR Project Manager – Farley  
Mr. C. A. Patterson, Senior Resident Inspector – Farley  
Mr. F. J. Congel, Director, Office of Enforcement

Alabama Department of Public Health  
Dr. D. E. Williamson, State Health Officer

IE04

**ENCLOSURE**

**Southern Nuclear Operating Company  
Joseph M. Farley Nuclear Plant**

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## ENCLOSURE

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### Finding

NRC Integrated Inspection Report 05000348/2003005 and 05000364/2003005, section 2PS1 states:

#### 2PS1 Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems

##### b. Findings

Introduction. The NRC identified a Green NCV for the failure to implement adequate QA procedures to ensure representative sampling of airborne radioactive particulates from the U2 plant vent.

Enforcement. Technical Specification 5.4.1(b) requires QA procedures for effluent monitoring to be established and implemented using the guidance contained in RG 4.15. RG 4.15 requires the implementation of QA procedures necessary to verify that effluent samples are representative of the sample medium. Contrary to the above, the licensee failed to implement QA procedures to ensure representative sampling of particulate radionuclides released from the U2 plant vent to the off-site environs. Because the failure to establish and implement these QA procedures was determined to be of very low safety significance and has been entered into the licensee's corrective action program (CR Number 2003003616) this violation is being treated as an NCV, consistent with Section VI.A of the NRC Enforcement Policy: NCV 50-364/03-05-02, Failure to Implement Adequate QA Procedures for Monitoring Particulate Effluents from the Unit 2 Plant Vent.

### Admission or Denial

The violation occurred as described in the identified green non-cited violation.

### Reason for Violation

The adverse condition was personnel error in that management failed to recognize the need to implement QA procedures to periodically test the HEPA filters which will ensure representative sampling of particulate radionuclides released from the Unit 2 plant vent.

### Corrective Steps Taken and Results Achieved

The design of the Plant Farley vent air sampling system is anisokinetic but complies with the Farley design and regulatory requirements. For Plant Farley, the design of the sampling system meets the sampling requirements of ANSI N13.1-1969, as referenced in Regulatory Guide 4.15, February 1979. The ANSI recommends that isokinetic sampling be used when particles larger than 5 microns are anticipated. Upstream from the sample point for Farley monitor R-29A, there are high efficiency particulate air (HEPA) filters which limit the size of the particulate discharge. These HEPA filters have a design efficiency of 99.97 percent for particles 0.3 microns and larger; therefore, isokinetic sampling is not required.

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Subsequent to the inspection, SNC performed HEPA filter testing for the Unit 2 containment purge exhaust, Units 1 & 2 spent fuel ventilation exhaust, and Units 1 & 2 radwaste ventilation exhaust HEPA filters. The testing indicates a 99.9 percent efficiency for the HEPA filters for in-place testing per guidance from ASME N510-1989. The results of these in-place tests indicate the successful filtration of 5 micron particles which is the acceptance criteria per ANSI N13.1-1969.

Testing of the Unit 1 containment purge exhaust is planned for the next refueling outage scheduled to begin October 2, 2004.

### **Corrective Steps That Will Be Taken To Avoid Further Violation**

Administrative controls are in place to perform periodic spent fuel, radwaste, and containment ventilation HEPA filter testing to ensure the filters remain functional, thereby ensuring a representative sample.

Based on the periodic HEPA filter testing and the current Farley plant vent air sampling system design and regulatory compliance, no additional corrective steps are required.

### **Date of Full Compliance**

All planned corrective actions will be completed following completion of the Farley Unit 1 refueling outage scheduled to begin on October 2, 2004.