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F. L. CLAYTON, JR.
Senior Vice President

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July 6, 1979

Mr. J. T. Sutherland
U. S. Nuclear Regulatory Commission
101 Marietta Street, N. W.
Atlanta, Georgia 30303

SUBJECT : J. M. Farley Nuclear Plant
NRC Inspection of May 21-25, 1979

REFERENCE: RII:GLT 50-348/79-21

Dear Mr. Sutherland:

This letter refers to the apparent infractions in the subject inspection report which states:

- A. As required by Criterion V of Appendix B of 10 CFR 50 and as implemented by Operations Quality Assurance Policy Manual, Section 5, "Activities affecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings. Instructions, procedures or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished." Drawing D-175004, "P & J Diagram - Drains and Vents CTMT and Auxiliary Building-Radioactive" shows that three sink drains and two floor drains in the decontamination room drain into the Unit 1 drain system.

Contrary to the above, the drain system was installed with three drains draining into the Unit 1 drain system and 3 draining into the Unit 2 system. Drain piping from decontamination sinks was then incorrectly connected to sink drain line draining into Unit 2. Criteria was not provided (e.g., flow test) to assure that the sinks were satisfactorily installed. This led to the release of radioactive waste from the sinks into Unit 2 and the environment.

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- B. As required by 10 CFR 20.203(B), each radiation area shall be conspicuously posted "Caution - Radiation Area".

Contrary to the above, on May 23, 1979, the piping penetration room was not posted as a radiation area although the dose rate inside was as high as 65 mrem/hr.

- C. As required by Technical Specification 6.11, procedures for personnel radiation protection shall be adhered to. Section I.C of the Farley Health Physics Manual requires that each individual must obey plant health physics procedures and practices.

Contrary to the above, on May 25, 1979, an individual was observed by the inspector to enter an area posted "No entry - contact health physics". It was determined that the individual had not contacted health physics prior to his entry into the area.

The plant is taking the following corrective action:

- A. Corrective action to this apparent infraction was included in the Non-Routine Environmental Report, dated May 25, 1979. As stated in the report, a supplement will be issued upon completion of corrective action.

In addition to the corrective action given in the Non-Routine Environmental Report, FNP-0-AP-52 (Equipment Status Control and Maintenance Authorization) will be revised by September, 1979 to ensure that shop work orders are reviewed to determine if design changes are involved. Also, weekly surveys during outages and monthly surveys during normal operations will be conducted in the Unit 2 Auxiliary Building.

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An Alabama Power Company investigative committee was also formed to review this incident.

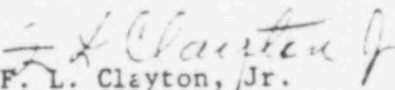
- B. This particular infraction was corrected immediately by placing a "Caution - Radiation Area" sign on the rope at the Piping Penetration Room. In addition, other doorways in which similar conditions could exist are being investigated to ensure proper posting is in effect and is in clear view.

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The Plant Manager has issued a memorandum to all employees discussing the importance of keeping radiation signs in place. In addition, the memorandum was discussed by the Plant Manager with plant employees at the June 28, 1979 Safety Meeting.

- C. The individual involved was counseled by the Operations Superintendent on the date of occurrence. Further, the Plant Manager has issued a memorandum to all plant personnel emphasizing the necessity for compliance with all administrative controls whether the basis is apparent or not. In addition, the memorandum was discussed by the Plant Manager with plant employees at the June 28, 1979 Safety Meeting.

Yours very truly,


F. L. Clayton, Jr.

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