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Alabama Power  
the southern electric system

November 1, 1989

Docket Nos. 50-348  
50-364

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

Gentlemen:

Joseph M. Farley Nuclear Plant  
NRC Simulator Training Concerns Identified  
In Inspection Report Nos. 50-348/89-19 and 50-364/89-19

By letter of September 12, 1989, the NRC raised concerns regarding simulator training deficiencies in the areas of communications, normal operations, immediate operator actions and accident mitigation strategies. These concerns have been reviewed and in order to continue to improve in the areas noted in the inspection report the following actions have been or will be performed.

Communications

As a result of the concerns noted during the NRC administered license requalification examination in June, increased emphasis was placed on communications. The importance of clear concise communications will continue to receive increased emphasis in the Operations Group. The topic of complete and accurate communication will be emphasized in the classroom and simulator portion of Operations training. In addition, proper communications comprises one part of operator and team performance that is evaluated during the annual simulator examination.

Normal Operations

In addition to communications, normal operations has also received increased attention during simulator training conducted since June. Normal operations and procedural adherence will continue to receive increased emphasis during annual simulator training. In addition, training includes certain "off normal" situations that have occurred during actual operations to ensure that the lessons learned are appropriately applied.

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### Immediate Operator Action

A new Operation Standing Policy has been developed and issued that gives instructions on how immediate operator actions are expected to be performed, verified and communicated by the individual operator and the shift team. This policy has been reviewed with each crew during crew meetings and is being emphasized during the simulator training. In addition, this policy will be developed into a performance guide that will be used as a standard for proper immediate operator action.

### Accident Mitigation Strategies

In order to ensure that every licensed person at Farley understands the actions for an ATWS, a Training Change Notice was issued explaining the purpose and importance of tripping the turbine during an ATWS event. For the SGTR event, a recent enhancement in operations philosophy had been made to provide for a manual reactor trip prior to manual safety injection. The previous philosophy was to manually safety inject since that would give a reactor trip and water inventory make-up. This could, however, lead to an aggravated ATWS scenario if the reactor does not trip on the safety injection signal, but the main feed pumps are tripped. This change in operating philosophy had been promulgated but not emphasized. In addition, it should be noted that this was the first time this crew had been evaluated on this changed philosophy.

### General

The performance of the crew observed by the NRC in the simulator clearly was not to Farley Nuclear Plant standards. The apparent unwillingness to take constructive criticism, the inconsistency in performance and the off-handish manner that actions were taken are especially of concern. However, as noted in your report, the specific items were observed and corrected by the instructor during the training; hence, the requalification process is working. A meeting was subsequently held with this crew, the plant manager and the Vice President-Nuclear. The purpose was to obtain the crew's insight as to why they performed as they did and to ensure that they understood the proper attitude that they were expected to have concerning their jobs at Farley Nuclear Plant.

It is our experience that this crew's performance was not and is not typical of Farley Operations. However, we are continuing to monitor for indication of these or other problems in our performance.

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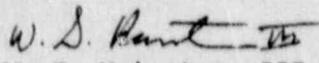
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It is felt that the actions outlined above and our continued emphasis on a professional approach to operations will ensure that the noted areas are corrected and that operator performance will continue to improve.

If you have any questions, please advise.

Respectfully submitted,

ALABAMA POWER COMPANY

  
W. G. Hairston, III

WGH, III/JAR:md-10.54

cc: Mr. S. D. Ebnetter  
Mr. E. A. Reeves  
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