



Southern Nuclear Operating Company

the southern electric system

Dave Morey
Vice President
Farley Project

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Docket Nos. 50-348
50-364

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

Joseph M. Farley Nuclear Plant
Reply to an Exercise Weakness
NRC Inspection Report Nos. 50-348/93-29 and 50-364/93-29

Gentlemen:

This letter responds to the Exercise Weakness (EW-50-348,364/93-29-03) "Failure to follow EIPs concerning the radiological monitoring and protection actions for ERO personnel", as presented in the subject NRC inspection report. The Exercise Weakness (EW) therein states:

Procedure FNP-0-EIP-4.0, "Health Physics Support to the Emergency Plan", Rev. 24 delineates the responsibilities of the Health Physics Manager located in the TSC, including steps:

- * 3.5 - Monitoring of personnel in the EOF and Assembly area;
- * 3.2.1 - Monitoring changes in radiological conditions and recommending actions to the Emergency Director; and
- * 3.21.3 - Relocation of Security Post.

Procedure FNP-0-EIP-27, "EOF Setup and Activation," Rev. 23, delineates the responsibilities of the Dose Assessment Director located in the EOF, including:

- * Ensuring HP coverage of the EOF as required,
- * Having EOF ventilation shifted to the Isolate Mode if radiological conditions warrant, and
- * Issuing dosimetry if radiological conditions warrant.

During the exercise, a radiological release began at about 10:45 a.m. causing measurable radiation exposures at the site boundary. The general direction of the release was west and traveling at about three miles per hour. The release continued throughout the exercise which was terminated at about 1:00 p.m. During that time no radiological surveys were performed in or outside the licensee's EOF located approximately southwest of the release point. A security post also in the west entrance to the site was not evacuated or relocated during the exercise.

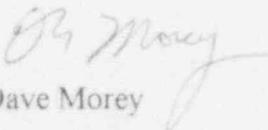
The EOF and the Security Post were close to the release point and in the general direction of the radioactive plume. The inspector reported that it was appropriate to provide radiological monitoring of the EOF and prepare for relocation of the security post should the plume move into those areas. The inspector determined that the Health Physics Manager should have assessed radiological conditions at the security post and the EOF and have taken appropriate actions to protect personnel at those locations. Additionally, the Dose Assessment Director should have requested HP coverage at the EOF and should have taken action to protect EOF personnel.

The inspector stated that failure to take appropriate protective actions for ERO personnel as required by the licensee's EIP would be identified as an EW.

By letter dated January 7, 1994, the NRC Staff requested that Southern Nuclear Operating Company advise them of the corrective action taken or planned, as well as the estimated date of completion, with regards to the EW. This response is to be provided within 45 days of the date of the inspection report. The Southern Nuclear response to this EW is provided in the attachment to this letter.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY


Dave Morey

WHL EW-93-29.DOC

Attachment

cc: Mr. S. D. Ebnetter
Mr. B. L. Siegel
Mr. T. M. Ross

Attachment 1

Reason for Exercise Weakness

The reason for the exercise weakness was personnel error in that no monitoring was provided for the security post or the EOF.

A potential contributing factor was that the HP Manager used the HP Manager Guideline in EIP-4.0 to direct his activities. The Guideline allows the HP Manager to perform radiological monitoring in the EOF *as applicable*. However, the body of the procedure *requires* radiological monitoring in the EOF.

Corrective Action Taken and Results Achieved

The Exercise Weakness was reviewed with the personnel involved during the post drill critiques.

Corrective Steps to Avoid Recurrence

- 1) Training will be provided to the Emergency Directors, Recovery Managers, Dose Assessment Directors and HP Managers concerning failure to provide radiological monitoring for the security post and EOF.
- 2) The inconsistency between the HP Manager Guideline of FNP-0-EIP-4.0 and the text in the main body of EIP-4.0 will be corrected.
- 3) All EIPs will be reviewed to verify that there are no other inconsistencies between checklists and guidelines and the EIP text.

Date Corrective Actions to be Complete

The corrective actions will be complete by 3/21/94.