## ENCLOSURE

## NOTICE OF VIOLATION

Alabama Power Company Farley 2 Docket Nos. 50-364 License Nos. NPF-8

During the Nuclear Regulatory Commission (NRC) inspection conducted on November 10 through December 29, 1990, a violation of NRC requirements was identified. The violation involved inadequate procedures for mio-loop operation. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990), the violation is cited below:

Technical Specification 6.8.1 requires that applicable written procedures recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, 1978 shall be established, implemented and maintained.

Procedure FNP-2-SOP-1.11, Mid-Loop Operations, Revision 3, Section 3.12, required that the reactor vessel head be fully de-tensioned and stud nuts loosened at least 0.17 inch deflection, or the pressurizer manway removed, or at least one pressurizer safety valve removed to prevent RCS pressurization in the event of a loss of core cooling.

Contrary to the above, on December 9, 1990, operating and maintenance procedures were inadequate to ensure that specified reactor coolant system (RCS) vents were maintained while the RCS was in "mid-loop" operations. After placing the reactor head on the reactor vessel, maintenance personnal proceeded to install the reactor vessel head stud nuts and washer hand tight without informing reactor control operators or any assurance that the venting requirements of operating procedure FNP-2-SOP-1.11, Rev. 3 were met.

Even though FNP-2-SOP-1.11 provided operational guidance for the placement of stud nuts in a position which allowed for head deflection and subsequent RCS venting, the procedure was inadequate in that it failed to provide specific guidance, to both operations and maintenance personnel to ensure that the nuts were loosened at least 0.17 inches deflection. In addition, the corresponding mechanical maintenance procedure, MP-1.0, used by maintenance personnel for installing the vessel head, failed to make provisions for recommended placement of the studs nuts as prescribed by FNP+2-SOP+1.11.

This is a Severity Level IV violation (Supplement 1).

Pursuant to the provision of 10 CFR 2.201, Alabama Power Company is hereby required to submit a written statement or explanation to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and if applicable, a copy to the NRC

Alabama Power Company Farley 2 Docket No. 50-364 License No. NPF-8

Resident Inspector, Farley, within 30 days of the date of the letter transmitting this Notice of Violation. This reply should be clearly marked as a "Reply to the Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extend the response time.

FOR THE NUCLEAR REGULATORY COMMISSION

David M. Verrelli, Chief Reactor Projects Branch 1 Division of Reactor Projects

Dated at Atlanta, Georgia this 4th day of January 1991 5