



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

Report Nos.: 50-348/83-01 and 50-364/83-01

Licensee: Alabama Power Company
600 North 18th Street
Birmingham, AL 35291

Docket Nos.: 50-348 and 50-364

License Nos.: NPF-2 and NPF-8

Facility Name: Farley 1 and 2

Inspection at J. M. Farley site near Ashford, Alabama

Inspector: *D. M. Montgomery for* 1-31-83
A. L. Cunningham Date Signed

Approved by: *D. M. Montgomery* 1-31-83
D. M. Montgomery, Section Chief Date Signed
Operational Program Branch
Division of Engineering and Operational Programs

SUMMARY

Inspection on January 11-14, 1983

Areas Inspected

This routine, unannounced inspection involved 28 inspector-hours on site in the areas of radiological environmental monitoring including management and administrative controls; status review of the radiological environmental monitoring program; inspection of selected monitoring and sampling stations; review of monitoring records and data compiled during January 1, 1982 to present; verification of placement of co-located TLDs deployed under the NRC TLD Direct Radiation Monitoring Network; review of the environmental sample intercomparison program.

Results

Of the six areas inspected, no violations or deviations were identified.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

W. G. Hairston, III, Plant Manager
*J. D. Woodard, Assistant Plant Manager
*W. C. Carr, Chemistry and Health Physics Supervisor
*W. G. Gripentog, Environmental Supervisor
*W. Ware, Supervisor, SAER
*J. Withrow, Lead Auditor
L. W. Drew, Chemist

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on January 14, 1983, with those persons indicated in paragraph 1 above.

3. Licensee Action on Previous Enforcement Matters

No previous enforcement matters were outstanding.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Management Controls

- a. Management and administrative controls defined in Section 6.0 of Units 1 and 2 Technical Specifications were reviewed by the inspector with respect to the following items: (1) organizational and management responsibility for implementation of the radiological environmental monitoring program; (2) environmental monitoring program procedures; (3) quality assurance including periodic audits and analytical quality control. These items are discussed below.
- b. The inspector conducted a comprehensive review, including discussions with cognizant licensee representatives, of current corporate organization to determine the adequacy of specific management responsibility for assuring implementation of the radiological environmental program. Immediate responsibility for implementation of environmental monitoring, including maintenance and operation of sampling stations and submittal of samples to contractor laboratories for analysis, is assigned to the Chemistry and Health Physics Supervisor and his staff. Inspection disclosed that program management was consistent with the requirements defined in the specifications. There were no questions regarding this item.

- c. Technical Specification 6.5.2.8.k provides for audits of the radiological effluent and environmental monitoring programs and the results thereof, at least, once per twelve months. Licensee audits of the radiological environmental monitoring program conducted during 1981 and 1982 were reviewed. The review, including discussion with cognizant licensee representatives, disclosed that established procedures provided a system of reporting audit results to management and supervision, and a system for followup to determine completion of required corrective action. Audits conducted during the above cited periods included contractor laboratories which routinely conduct required radiochemical analyses of environmental samples. Contractor laboratories include Eberline Midwest Facility and the University of Georgia Center for Applied Isotopic Studies. Inspection disclosed that required audit followup and completion of corrective actions for identified audit findings were implemented (Audit Report Nos. 82/5, 82-705 82-832, 81-739, and 81-763). There were no questions regarding this item.
- d. Technical Specification 6.8.1.i requires preparation of and adherence to detailed written procedures for all activities involved in implementing the radiological environmental monitoring program defined in Technical Specification 3/4.12 using the guidance promulgated in Regulatory Guide 4.15, February 1979. The subject specification further requires that such procedures apply to sampling, data recording and storage, measurements and analysis, and actions to be taken when limits are approached or exceeded. During the previous radiological environmental inspection (50-348/81-24, 50-364/81-27), a comprehensive review of monitoring and analytical procedures was conducted. During the current inspection the inspector conducted a detailed review of procedural revisions implemented subsequent to the above referenced inspection. These procedures are listed below.

FNP-0-ENV-1	(R3, 11/9/82) Assignment of Classification Code Numbers to Environmental Radioactivity Samples
FNP-0-ENV-2	(R9, 6/8/82) Sampling of Milk from Dairy Cows or Goats for Radioactivity Analysis
FNP-0-ENV-3	(R4, 6/7/82) Air Sampling for Radioactive Particulates and Radioiodine Analysis
FNP-0-ENV-5	(R7, 6/8/82) Sampling of Water in the Chattahoochee River for Radioactivity Analysis
FNP-0-ENV-6	(R5, 6/8/82) Sampling of Forage for Radioactivity Analysis
FNP-0-ENV-9	(R2, 6/22/82) Collection of Fish, Clams, and Vegetation from the Chattahoochee River for Radioactivity Analysis

FNP-0-ENV-11	(R2, 10/28/83) Surveillance of Environmental Sampling Stations
FNP-0-ENV-17	(R3, 12/28/81) Meteorological Tower Support Activity
FNP-0-ENV-19	(R0, 1/25/80) Maintenance of Propane Generator for the Meteorological Tower
FNP-0-ENV-101	(R6, 1/25/80) Schedule, Environmental Monitoring Program

Inspection disclosed that the above referenced revised procedures and licensee contractors' QA/QC procedures are consistent with Technical Specification requirements and accepted industry practice. The latter finding regarding contractor QA/QC procedures closes out a previously identified followup item (50-348/81-24-01, 50-364/81-27-01). There were no further questions regarding this item.

6. Quality Control of Analytical Measurements

Radiological environmental samples collected by the licensee are analyzed under contracts with Eberline Instrument Corporation (Midwest Facility) and the University of Georgia Center for Applied Isotope Studies. The contractors routinely provide the licensee with analytical quality control data and results generated from intra-laboratory and inter-laboratory cross-checks. Conversely, the licensee's quality assurance program includes annual audits of contractor laboratories, analytical procedures, and quality assurance/quality control programs as discussed in paragraph 5.c. above. Annual summary data compiled by the State of Georgia on split and duplicate samples compared favorably with equivalent data reported by licensee contractor laboratories in the Annual Environmental Operating Report for the period ending December 31, 1981. There were no questions regarding this item.

7. Implementation of Radiological Environmental Monitoring Program

- a. Technical Specification 3/4.12 defines the requirements for the radiological environmental monitoring program. Inspection included review and discussion of the following items with cognizant licensee representatives: (1) Annual Environmental Report for the period ending December 31, 1981; (2) environmental sampling field data and records for the period January 1, 1982 through December 31, 1982; (3) records/invoices of licensee shipments of environmental samples to contractor laboratories for radiochemical analyses during the period January 1, 1982 through December 31, 1982. Inspection disclosed that the above elements of the subject program were consistent with Technical Specification requirements.

b. The inspector accompanied a licensee representative on the routine weekly collection/deployment of air particulate filters and radioiodine cartridges at all assigned air monitoring station as defined in Technical Specification-3.12, table 3.12-1. Surface water sample collections were also included. Inspection disclosed the following:

- (1) collection/deployment of particulate filters, radioiodine cartridges, and surface water samples was consistent with required procedures; (2) all samples were appropriately identified and labeled for shipment to contract laboratories; (3) air monitor gas meters at each air monitoring station were periodically calibrated as required; (4) the air sampling pump motor at monitoring station 1218 (Dothan substation) malfunctioned (without tripping circuit breaker) and resulted in a weekly sample volume of only 64m³ for the week ending December 31, 1983. Inspection further disclosed that air monitoring station No. 1218 has exhibited a history of malfunctioning and pump motor failure. Licensee representatives agreed to conduct an immediate investigation to correct the above cited pump failures. This item will be reviewed during a subsequent inspection (50-349/83-01-01, 50-364/83-01-01).

8. TLD Direct Radiation Monitoring Network

The inspector verified the deployment of licensee TLDs at locations co-located with NRC TLD Stations. The inspector noted that licensee TLDs were deployed in accordance with license requirements and had no further questions regarding this item.

9. State Program (Nuclear Facility Monitoring)

Inspection included review of the 1981 data (January 1, 1981 to December 31, 1981) for environmental surveillance of radioactivity within the Farley facility environs conducted by the Environmental Protection Division of the State of Georgia Department of Natural Resources under NRC Contract. Analysis of all samples collected by or assigned to the State were performed by the Environmental Protection Division Laboratories. The interlaboratory analytical comparative program with the licensee included split and/or duplicate sample analyses for gross alpha, gross beta, and gamma isotopic analyses of air, surface water, milk forage, and fish. Review of the subject report disclosed close agreement of analytical results for the above parameters as disclosed by the State and licensee contractor laboratories. Radioactivity concentrations detected within the plant environs were significantly below action levels assigned by the licensee and the applicable limits specified in 10 CFR 20. Review of results of the EPA Cross-Check Program conducted during the 1981 calendar year indicated close agreement for all parameters involved. There were no questions regarding this item.