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Southern Nuclear Operating Company
the southern electric system

March 9, 1995

Docket Numbers: 50-348
50-364

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

Joseph M. Farley Nuclear Plant
Reply to an Inspector Follow-up Item (IFI)
NRC Inspection Report Nos. 50-348/94-25 and 50-364/94-25

Gentlemen:

As requested by your transmittal dated January 30, 1995, this letter responds to IFI 50-348, 364/94-25-01, "Exercise Weakness for failure of the Control Room Supervisors to recognize an Emergency Action Level (EAL) for an Alert classification". The Southern Nuclear Operating Company (SNC) response to IFI 50-348, 364/94-25-01 is provided in Attachment 1.

Respectfully submitted,

Dave Morey

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Attachments

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

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ATTACHMENT I

RESPONSE TO IFI 50-348, 364/94-25-01

IFI 50-348, 364/94-25-01 states the following:

FNP-0-EIP-9.0, "Emergency Classification and Actions" provided for off normal events to be classified into one of the four emergency classification categories. The initial classification of the exercise was to be an Alert as required by EIP-9, Guideline 3, step 1.3 "Degraded Core/Fuel Fault" due to Dose Equivalent Iodine (DEI) being $> 300 \mu\text{Ci/gm}$. The EAL input was a telephone call from Chemistry at 8:05 a.m. that the Reactor Coolant System (RCS) Post-Accident Sampling System (PASS) sample indicated the "DEI was $384 \mu\text{Ci/gm}$." Both the Unit 1 and Unit 2 Supervisors for the exercise failed to recognize the high RCS activity as an EAL entry for an Alert classification. A decision was made to classify at a Notification of Unusual Event (NOUE) based on a containment integrity issue due to the indication that the mini-purge system may not have completely isolated on demand. While the NOUE notification message was being prepared, the oncall Emergency Director (ED) came into the Control Room. When the oncall ED was presented a status brief he asked if the RCS activity wouldn't be an Alert classification. The acting ED (Unit 2 Shift Supervisor) then reviewed the EAL and confirmed the Alert classification. The NOUE message formulation was terminated and the Alert declaration was made at 8:32 a. m. and required notifications were made shortly thereafter. The failure of the Control Room shift to recognize the Alert EAL was identified as an exercise weakness for inspector follow-up.

SNC Response

In response to IFI 50-348, 364/94-25-01, FNP determined the error was a personnel error made by the drill Unit 2 Shift Supervisor. There has been no evidence of a generic weakness in classification during Simulator training, or other plant drills.

The crew had made a decision that a NOUE was required based on a shutdown required by a loss of containment integrity, and was in the process of declaring a NOUE. The Unit 1 Shift Supervisor then received the initial report of RCS activity being $384 \mu\text{Ci/gm}$ DEI and evaluated that value against Technical Specifications. The Unit 1 Shift Supervisor determined that a shutdown was required by Technical Specifications and thought this only constituted a second NOUE declaration criteria. The Unit 1 Shift Supervisor then reported this information to the on-shift ED (Unit 2 Shift Supervisor) who also inappropriately categorized the high RCS activity and required shutdown as a NOUE. The Unit 2 Shift Supervisor did a review of the Alert EALs, but overlooked the failed fuel criteria.

The Supervisors did not perform a systematic evaluation of the EALs and during their quick look at the Alert levels, they overlooked the failed fuel criteria for Alert.

The drill on-call Emergency Director corrected the Shift Supervisors failure to classify the alert condition based on high RCS activity.

During 1995 Cycle one retraining, all Senior Reactor Operators, Emergency Directors, Recovery Managers, Recovery Manager Assistants and Technical Managers received training relating to the exercise weakness. The main topics of the training were 1) the errors

RESPONSE TO IFI 50-348, 364/94-25-01

made during the alert classification, 2) the failed fuel criteria for all emergency classification criteria, 3) the exercise scenario including the correct emergency classifications and 4) the necessity of using a systematic approach to emergency classification.