

FEB 05 1992

NOTICE OF VIOLATION

Alabama Power Company
Farley 1 and 2

Docket Nos. 50-348, 50-364
License Nos. NPF-2, NPF-8

During an NRC inspection conducted on January 6-10, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violation is listed below:

Technical Specification (TS) 6.11 states that procedures for radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

10 CFR 20.203(f)(1) and (2) require, in part, for containers, except as provided in paragraph (f)(3), that each container of licensed material shall bear a durable, clearly visible label identifying the radioactive contents. The label is to bear the radiation caution symbol and the words "Caution-Radioactive Material" or "Danger-Radioactive Material." The label shall also provide sufficient information (as appropriate, the information will include radiation levels, kinds of materials, estimate of activity, etc.) to permit individuals handling or using the containers, or working in the vicinity thereof, to take precautions to avoid or minimize exposures.

10 CFR 20.203(f)(3)(vi) further states that labeling is not required for containers which are accessible (for example, containers in locations such as water filled canals, storage vaults, or hot cells) only to individuals authorized to handle or use them, or to do work in the vicinity thereof, provided that the contents are identified to such individuals by a readily available written record.

Farley Nuclear Procedure (FNP)-0-RCP-57, Radioactivity and Potentially Radioactive Material Handling, Revision 16, dated March 28, 1991, requires in part, the following:
(1) Item 3.1 - Items that have been determined to be radioactive by a health physics (HP) representative shall be identified as radioactive material using the appropriate bag, tag, labels, or signs; (2) Item 3.1.1 - The label, bag, tag, or sign may include, at the HP technician's discretion, information such that the person handling the material or working in the vicinity of the material can implement appropriate actions and precautions to minimize their exposure; (3) Item 3.1.1.1 - A contact maximum radiation level on the surface of radioactive material or container should be considered the minimum for personnel awareness;

and (4) Item 3.1.1.2 - Other information such as fixed/smearable radioactive contamination levels, isotopes, etc. Further, a note to Item 3.1.1.2 states: Radioactive materials located in a rad bag or within boundaries of an area posted as "Radioactive Material" do not require individual tags, labels, or signs.

Contrary to the above, the FNP-0-RCP-57 procedure for labeling radioactive material in accordance with 10 CFR 20.203 was inadequate in that it contained an internal inconsistency. The note to Item 3.1.1.2 conflicted with Item 3.1.1.1, in that radioactive materials in a rad bag (containers) do not, as a minimum, have to be labeled with a contact maximum radiation level.

In addition, the licensee was not adequately implementing the 20.203(f)(3)(vi) labeling exemption for which procedure FNP-0-RCP-57 was taking credit. Specifically, the licensee had not provided a written record of the contents of all radioactive material that was readily accessible to workers. Although area postings often highlighted the contents and/or characteristics of a specific container within an area, this methodology was not uniformly employed for all containers of radioactive material present within the posted areas.

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

Pursuant to the provisions of 10 CFR 2.201, Alabama Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at Farley within 30 days of the date of this letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a 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 or demand for information may be issued as to 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 extending the response time.

Dated at Atlanta, Georgia
this 5th day of February, 1992