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Dave Morey
Vice President
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Southern Nuclear Operating Company

the southern electric system

November 13, 1995

Docket Numbers: 50-348

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

Joseph M. Farley Nuclear Plant (FNP)
Reply to Notice of Violation (VIO)
NRC Inspection Report Nos. 50-348/95-16 and 50-364/95-16

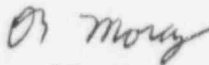
Ladies and Gentlemen:

As requested by your transmittal dated October 16, 1995, this letter responds to VIO 50-348/95-16-01, "Improperly Installed Scaffolds Over Safety-Related Equipment". The Southern Nuclear Operating Company (SNC) response to VIO 50-348/95-16-01 is provided in the attachment.

Confirmation

I affirm that the response is true and complete to the best of my knowledge, information, and belief.

Respectfully submitted,


Dave Morey

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Attachments

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

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ATTACHMENT 1

RESPONSE TO VIO 50-348/95-16-01

VIO 50-348/95-16-01 states the following:

Technical Specification 6.8.1.a requires that applicable written procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, be established, implemented and maintained. Appendix A, Section 9.a recommends procedures for performing maintenance that can affect safety-related equipment.

General Maintenance Procedure, FNP-0-GMP-60, Revision 13, "General Guidelines And Precautions For Erecting Scaffolding," Step 7.4.6, established specific requirements for the seismic bracing of scaffolds installed near safety-related equipment. Also, Step 7.1 established provisions for the Shift Foreman Operating (SFO) to ensure, where possible, that scaffolds were not erected simultaneously over redundant safety-related pumps and/or components.

Contrary to the above, on September 5 and 6, 1995, a number of scaffolds were found installed over safety-related pumps and components that did not conform with the construction requirements of GMP-60, Step 7.4.6. Furthermore, multiple scaffolds were approved by SFOs for installation over redundant trains of charging, containment spray and residual heat removal (RHR) systems without regard for the provisions of Step 7.1. Only the RHR scaffolding was actually erected over redundant trains.

Admission or Denial

The violation occurred as described in the Notice of Violation.

Reason for Violation

Personnel error was the reason for the violation. Individuals constructing and approving the construction of scaffolding in areas that could adversely affect safety related equipment were not adequately trained and were not sensitive to the guidance provided in FNP-0-GMP-60, Revision 13. In addition, there was a lack of understanding by Operations personnel of management expectations concerning the construction of scaffolding that could adversely affect safety related equipment.

In preparation for the unit 1 refueling outage, some activities associated with safety related equipment were scheduled for work prior to commencing the outage. Some of these activities involved the construction of scaffolding in areas containing safety related equipment. Pre-outage activities involving the construction of scaffolding in areas containing safety related equipment could have been performed acceptably if the scaffolding had been approved and constructed in accordance with FNP-0-GMP-60. Farley Nuclear Plant General Maintenance Procedure FNP-0-GMP-60 provides guidelines and installation requirements for erecting scaffolding with regard to both personnel safety and plant equipment operability. As a result of previous changes to GMP-60, personnel approving scaffolding perceived that if scaffolding was constructed per GMP-60, the operability of safety related equipment would be unaffected. However, personnel that approved scaffolding failed to recognize the necessity for appropriately controlling the construction of scaffolding over redundant trains of safety

related equipment in accordance with GMP-60, Step 7.1. In addition, failure of individuals that constructed scaffolding to fully understand the guidance provided in GMP-60 resulted in some scaffolding being built that was not in accordance with GMP-60, Step 7.4.6.

Corrective Actions Taken and Results Achieved

1. Construction of scaffolding near safety related equipment was temporarily suspended.
2. Walkdowns were conducted for identification of scaffolding not in compliance with GMP-60, Revision 13. Any such scaffolding was either removed, modified or an evaluation for acceptability was performed.
3. Contractor craft personnel involved in erection of scaffolding were retrained on the requirements of GMP-60.
4. Contractors that erect scaffolding revised their in-process program to require that personnel involved in erection of scaffolding are provided training on GMP-60.
5. As an interim measure, a Temporary Change Notice (TCN 13A) was issued for GMP-60 to require site engineering approval for all scaffolding erected in safety related areas prior to erection and prior to use until Qualified Reviewers could be trained. FNP-0-GMP-60 was subsequently revised (Revision 14) to provide additional guidance in the evaluation, approval erection, and review of scaffolding prior to use. Individuals from various work groups were trained for determining the acceptability of erected scaffolding and designated as Qualified Reviewers.
6. A Training Advisory Notice (TAN) was issued to plant staff personnel summarizing the Revision 14 changes to GMP-60.

Corrective Steps to Avoid Further Violation

A task force will reevaluate plant policies, training, and procedures related to scaffolding qualification, pre-construction and post-installation evaluations. This reevaluation will specifically address both construction and administrative control of scaffolds in the vicinity of safety related equipment. The scaffolding program, policies, training, and procedures will be revised accordingly.

Date of Full Compliance

July 31, 1996