

Enclosure 1

NOTICE OF VIOLATION

Southern Nuclear Operating Company
Farley Nuclear Plant, Units 1 and 2

Docket Nos.: 50-348 and 50-364
License Nos.: NPF-2 and NPF-8

During a NRC inspection conducted on September 18 through October 22, 1995, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600 (60 FR 34381, June 30, 1995), the violations are listed below:

- A. Technical Specification (TS) 6.8.1.a required that applicable written procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978, shall be established, implemented, and maintained. Regulatory Guide 1.33, Appendix A, Section 8.a, recommends that procedures of a type appropriate to the circumstances should be established to ensure that gauges, instruments, controls and other measuring and testing devices are properly controlled, calibrated and adjusted at specified periods to maintain accuracy. Step 4.1.3 of Administrative Procedure FNP-0-AP-11, Control and Calibration of Test Equipment, Test Instrumentation and Plant Instrumentation, Revision 9, required that a restricted use tag be placed on any instrument requiring special precautions in its plant usage. The tag will show instrument identification and list special restrictions on instrument usage.

Contrary to the above, restrictions associated with the use of the non-temperature compensated test gauges utilized to calibrate the pressurizer pressure transmitters on September 22 and March 29, 1995 in Units 1 and 2 respectively, were not provided to personnel performing the calibrations. As a result, temperature corrections were not applied to test gauge readings as required. Recent main steam safety valve setpoint testing in Units 1 and 2 and reactor coolant system flow transmitter calibrations in Unit 1 were additional examples where restrictions associated with the use of non-temperature compensated test gauges were not provided.

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

- B. The Limiting Condition for Operation for TS 3.7.7 requires that two independent control room emergency air cleanup systems shall be operable for all modes of operation.

Contrary to the above, the licensee confirmed on September 8 and 26, 1995 that the charcoal filter heater humidity controllers for the A and B trains, respectively, of the control room pressurization units were inoperable, and had been for an indeterminate period of time. A licensee self-initiated safety system assessment of the normal and emergency control room ventilation systems had identified on August 9 that the pressurization unit humidistats were not included in any preventive maintenance or surveillance test program. Furthermore, no records existed to show that these humidistats had ever been calibrated since Units 1 and 2 were licensed.

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

- C. Technical Specification 6.8.1.a requires that applicable written procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978, shall be established, implemented and maintained. Appendix A, Section 1.d recommends administrative procedures on procedure adherence and temporary change to procedures.

FNP-0-AP-6, "Procedure Adherence," Revision 2, establishes provisions for assuring adherence to safety-related plant procedures. Deviations from plant procedures shall not be permitted except under emergency conditions or as allowed by an approved temporary change notice (TCN).

Contrary to the above, from September 16 through October 4, 1995, four examples of failure to follow written procedures occurred as follows:

- On October 4, following the exigent shutdown of Unit 2 in accordance with FNP-2-UOP-2.1, Revision 16, "Shutdown Of Unit From Minimum Load To Hot Standby," plant operators had not initialed and dated the steps listed in Section 2.0, "Initial Conditions."
- On October 3, prior to filling and pressurizing the Unit 1 Chemical Volume and Control System in accordance with FNP-0-PMP-505, Revision 14, "System Inservice And Hydrostatic/Pneumatic Testing," the test supervisor failed to complete the hydrostatic test valve lineup and did not signoff the test sequence and data sheets.
- On September 22, during preparations to lift the Unit 1 upper internals in accordance with FNP-1-MP-1.0, Revision 24, "Maintenance Refueling Procedure," maintenance personnel inspected and lubricated the internals lifting rig in a manner and sequence different than prescribed by procedure without using a TCN.
- On September 16, during Unit 1 surveillance testing in accordance with FNP-1-STP-21.2, Revision 7, "MSIV Air System Leak Test," a system operator did not follow the prescribed valve alignment steps in a precise manner and failed to initial procedural steps as they were accomplished.

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

Pursuant to the provision of 10 CFR 2.201, Southern Nuclear Operating Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, Farley Nuclear Plant, within 30 days of the date of the 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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a 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.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Atlanta, Georgia
this 21st day of November 1995