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RP

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**Alabama Power**

*the southern electric system*

August 21, 1984

Docket No. 50-348

Docket No. 50-364

Mr. D. M. Verrelli  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N.W.  
Suite 3100  
Atlanta, GA 30303

**SUBJECT: J. M. Farley Nuclear Plant NRC Inspection of  
June 11 - July 10, 1984**

**RE: Report Numbers 50-348/84-17  
50-364/84-17**

Dear Mr. Verrelli:

This letter refers to the violation, cited in the subject inspection reports, which states:

"The following violations were identified during an inspection conducted on June 11 - July 10, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

Technical Specification 6.8.1 requires that written procedures shall be established, and implemented for surveillance, administrative and calibration procedures.

Contrary to the above, the licensee did not adequately establish and implement surveillance, administrative and calibration procedures as follows:

- 1) Although FNP-0-AP-14 requires the removal of hold tags and repositioning of control devices in a sequence specified by a tagging operations order, a systems operator positioned a valve out of the specified sequence for tagging order number 84-0461-2.

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- 2) FNP-1-SOP-22.0 had an inadequate system checklist in that the turbine driven auxiliary feedwater pump speed control was not included.
- 3) Instrument maintenance procedures were inadequate in that independent verification of transmitter valve position upon return to service was not required.
- 4) Instrument maintenance procedures were inadequate in that valves manipulated for transmitter calibrations were not identified in the procedure.

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

#### Admission or Denial

The above violation occurred as described in the subject reports.

#### Reason for Violation

- 1) The first part of this violation was caused by a personnel error in that a System Operator performed a sequence on the Tagging Operations Order improperly.
- 2) The second part of this violation was caused by a procedural deficiency in that the speed controller position of the turbine driven auxiliary feedwater pump was not specified by FNP-1-SOP-22.0. This case is unique in that the controller may be repositioned to slightly below the full speed position to produce rated flow as verified in an STP but upon return to service the controller needs to be returned to the full speed position in readiness for automatic operation.
- 3) The third part of the violation was caused by a procedural deficiency in that procedure FNP-2-IMP-206.8 failed to require an independent verification of the transmitter valve position.
- 4) The fourth part of the violation was also caused by a procedural deficiency in that instrument maintenance procedures failed to address the second isolation valves used for double valve protection.

Corrective Action Taken and Results Achieved

- 1) The Tagging Order was independently verified. The affected valves were in their proper positions.
- 2) Procedures FNP-1-SOP-22.0, FNP-2-SOP-22.0, FNP-1-STP-22.0, and FNP-2-STP-22.0 were changed to include turbine driven auxiliary feedwater pump speed controller position.
- 3) Procedure FNP-2-IMP-206.8 was changed to require independent verifications of valve positions.
- 4) Procedure FNP-0-IMP-0, which is referenced by FNP-2-IMP-206.8, was revised to define the use of the second isolation valve as an integral part of the three valve manifold.

Corrective Steps Taken to Avoid Further Violations

- 1) The person who improperly performed the Tagging Order was disciplined.
- 2) The procedures were changed as described above to include the speed controller position.
- 3) A review of safety-related instrument maintenance procedures will be conducted to determine which procedures need to be revised for independent verification. This review is scheduled to be completed by October 31, 1984.
- 4) Procedure FNP-0-IMP-0 was revised to explain the use of the second isolation valves used for double valve protection. All safety-related instrument maintenance procedures will also be revised to include these valves where necessary.

NOTE FOR 3) AND 4): In addition to the corrective steps stated in 3) and 4) above, a complete review of all Instrument and Control administrative and technical procedures will be performed with the intent of unifying, and upgrading where required, independent inspection requirements and inspection hold-point requirements.

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Date of Full Compliance

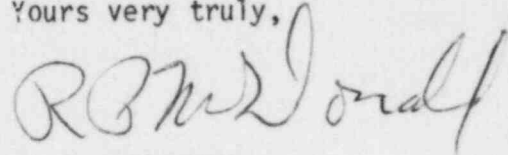
December 31, 1985

Affirmation

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

The information contained in this letter is not considered to be of a proprietary nature.

Yours very truly,

A handwritten signature in cursive script that reads "R. P. McDonald". The signature is written in dark ink and is positioned to the right of the typed name.

R. P. McDonald

RPM/DSM:sam