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Vice President  
Farley Project

Southern Nuclear Operating Company  
*the southern electric system*

March 26, 1996

Docket Nos.: 50-348  
50-364

10 CFR 2.201

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

Joseph M. Farley Nuclear Plant  
Reply to a Notice of Violation

Ladies and Gentlemen:

By letter dated March 4, 1996, the NRC notified Southern Nuclear that violation VIO 50-348, 364/95-21-02, Excessive Maintenance Overtime During Refueling Outages, had occurred at Farley Nuclear Plant. The response to the Notice of Violation is attached.

If you have any questions, please advise.

Respectfully submitted,

Dave Morey

REM/CLT:NOV9521.doc

Attachment

cc: Mr. S. D. Ebnetter, Region II Administrator  
Mr. B. L. Siegel, NRR Senior Project Manager  
Mr. T. M. Ross, FNP Sr. Resident Inspector

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## Response to VIO 50-348, 364/95-21-02

VIO 50-348, 364/95-21-02 states the following:

Technical Specification Section 6.2.2.f.3 limits the working hours of key maintenance personnel who perform safety-related work to 72 hours in seven days. Any deviation from this guideline shall be reviewed and approved by the Maintenance Manager or his designee (group supervisor).

Contrary to the above, during the last Unit 1 and 2 refueling outages in 1995, approximately 60 individuals worked between 80 to 84 hours in a seven day period. The Maintenance Manager, his superintendents, and group supervisors did not recognize these deviations had occurred in order to review and approve them. Consequently, the Maintenance Manager and his designees failed to limit the working hours of these maintenance workers to 72 hours in seven days.

### Admission or Denial

This violation occurred as described in the Notice of Violation.

### Reason for Violation

Personnel error in that Maintenance Supervision had not adequately evaluated each scenario of personnel rotating shifts during peak periods of outage overtime. It was incorrectly assumed that by limiting the number of hours worked per day to 12, the number of consecutive days worked to 6, and by providing a full 24 hours off that the technical specification requirement would be met in all situations when rotating personnel from one shift to another.

### Additional Information

Prior to the above mentioned Unit 1 and 2 refueling outages, temporary schedules were created, approved, and posted in accordance with Technical Specification 6.2.2.f. These temporary schedules, as approved, made allowances for the various maintenance crews to rotate from day shift to night shift (and vice-versa) approximately half-way through the outage. These schedules provided for each journeyman to receive a minimum of 24-hours off after having worked 6-12 hour day shifts before returning on the night shift rotation. Based on outage needs, some maintenance personnel were provided with 48 hours or more off during this swap over period. However, certain individuals provided with only 24 hours off actually worked greater than 72 hours in a 7-day period without the expressed consent or acknowledgment of Maintenance supervision.

### Corrective Steps Taken and Results Achieved

The event has been discussed with the Maintenance supervision personnel responsible for approving the schedule rotation in question.

### Corrective Steps to Avoid Further Violation

This event will be covered with all key supervisory personnel having scheduling responsibilities for personnel falling under the overtime restrictions of Technical Specification 6.2.2. Enhancements will be made to FNP-0-AP-64, Work Schedules for Personnel Performing Safety-Related Functions, to further clarify this restriction.

### Date of Full Compliance

Corrective action will be achieved by June 1, 1996.