



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

Report Nos.: 50-348/84-29 and 50-364/84-29

Licensee: Alabama Power Company
600 North 18th Street
Birmingham, AL 35291

Docket Nos.: 50-364 and 50-364

License Nos.: NPF-2 and NPF-8

Facility Name: Farley 1 and 2

Inspection Conducted: November 11, - December 10, 1984

Inspection at Farley site near Dothan, Alabama

Inspectors: *W. H. Bradford* 1/4/85
W. H. Bradford Date Signed

W. H. Ruland 1/4/85
W. H. Ruland Date Signed

Approved by: *F. S. Cantrell* 1/4/85
F. S. Cantrell, Section Chief Date Signed
Division of Reactor Safety

SUMMARY

Scope: This routine, unannounced inspection entailed 149 inspector-hours on site in the areas of monthly surveillance observation, monthly maintenance observation, operational safety verification, independent inspection effort, engineered safety system walkdown, and action on previously identified items.

Results: Within the areas inspected, no violations or deviations were identified.

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REPORT DETAILS

1. Licensee Employees Contacted

J. D. Woodard, Plant Manager
D. N. Morey, Assistant Plant Manager
W. D. Shipmen, Assistant Plant Manager
R. S. Hill, Operations Superintendent
W. C. Carr, Assistant Operations Superintendent
C. D. Nesbitt, Technical Superintendent
R. G. Berryhill, Systems Performance and Planning Superintendent
L. A. Ward, Maintenance Superintendent
L. W. Enfinger, Administrative Superintendent
J. E. Odom, Operations Sector Supervisor
B. W. Vanlandingham, Operations Sector Supervisor
T. H. Esteve, Planning Supervisor
J. B. Hudspeth, Document Control Supervisor
L. K. Jones, Material Supervisor
R. H. Marlow, Technical Supervisor
L. M. Stinson, Plant Modification Supervisor
W. G. Ware, Supervisor, Safety Audit Engineering Review

Other licensee employees contacted included technicians, operation personnel, maintenance and I&C personnel, security force members, and office personnel.

2. Exit Interview

The inspection scope and findings were summarized during management interviews throughout the report period and on December 10, 1984, with the plant manager and selected members of his staff. The inspection findings were discussed in detail.

3. Licensee Action on Previous Enforcement Matters

None.

4. Unresolved Items

Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve violations or deviations. New unresolved items identified during this inspection are discussed in paragraph 9.

5. Monthly Surveillance Observation (61726)

The inspectors observed and reviewed Technical Specification required surveillance testing and verified that testing was performed in accordance with adequate procedures; that test instrumentation was calibrated; that limiting conditions were met; that test results met acceptance criteria and

were reviewed by personnel other than the individual directing the test; that any deficiencies identified during the testing were properly reviewed and resolved by appropriate management personnel; and that personnel conducting the tests were qualified. The inspector witnessed/reviewed portions of the following test activities:

FNP-1/2-STP-1.0	Operations Daily and Shift Surveillance Requirements.
FNP-2-STP-24.2	Service Water "B" Train Inservice Test.
FNP-2-STP-20.0	Penetration Room Filtration System Train "A" Operability and Valve Inservice Test.
FNP-2-STP-20.5	Service Water Flow Path Verification.
FNP-2-STP-109.2	Power Range Neutron Flux Channel Calibration.
FNP-2-STP-3.1.	Borated Water Source Operability Modes 1,2,3,4.
FNP-1/2-FSP-3.0	Fire Protection Water System Dry Pipe - Weekly.
FNP-1/2-STP-7.0	Quadrant Power Tilt Ratio Calculation.
FNP-0-STP-53.0	Fire Protection CO ₂ Low Pressure System Operability Test.
FNP-1-STP-5	Control Rod Movement Verification.

Within the areas inspected, no violations or deviations were identified.

6. Monthly Maintenance Observation (62703)

Station maintenance activities of safety-related systems and components were observed/reviewed to ascertain that they were conducted in accordance with approved procedures, regulatory guides, industry codes and standards, and were in conformance with Technical Specifications.

The following items were considered during the review: limiting conditions for operations were met while components or systems were removed from service; approvals were obtained prior to initiating the work; activities were accomplished using approved procedures and were inspected as applicable; functional testing and/or calibrations were performed prior to returning components or systems to service; quality control records were maintained; activities were accomplished by qualified personnel; parts and materials were properly certified; radiological controls were implemented; and fire prevention controls were implemented.

Work requests were reviewed to determine the status of outstanding jobs to assure that priority was assigned to safety-related equipment maintenance which may affect system performance. The following maintenance activities were observed/reviewed:

- MWR 12589 - Replacement of diesel generator air compressor cover plates.
- Cable installation for hot shutdown panel neutron monitor.
- MWR 97797 - Spectrophotometer lab sink drain repair.
- MWR 102349 - Repair of freeze protection for Unit 1 condensate storage

tank suction valve for the motor driven auxiliary feedwater pumps.

- 2C Diesel generator "A and B" air compressors (PMS).
- 1A Hydrogen recombiner.
- 1B Waste gas compressor.
- Main steam valve room hydraulic snubber.

Within the areas inspected, no violations or deviations were identified.

7. Operational Safety Verification (71707)

The inspectors observed control room operations, reviewed applicable logs and conducted discussions with control room operators during the report period. The inspectors verified the operability of selected emergency systems, reviewed tagout records, and verified proper return to service of affected components. Tours of the auxiliary, diesel, and turbine buildings were conducted to observe plant equipment conditions, including fluid leaks and excessive vibrations.

The inspectors verified compliance with selected Limited Condition for Operations (LCO) and results of selected surveillance tests. The verifications were accomplished by direct observation of monitoring instrumentation, valve positions, switch positions and review of completed logs, records, and chemistry results. The licensee's compliance with LCO action statements were reviewed as they happened.

The following systems and components were observed/verified operational:

- Station electrical boards in the control room and various electrical boards throughout the plant for proper electrical alignment.
- Certain accessible hydraulic snubbers.
- Accessible portions of service water and component cooling water systems.
- Units 1 and 2 suction and discharging piping and valves on auxiliary feedwater system.
- Diesel generators and support systems.
- Certain accessible portions of CVCS piping and valves to and from the charging/high head safety injection pumps. Certain portions of RHR and containment spray systems.
- Portions of various other systems (safety-related and nonsafety-related).

- The inspectors reviewed various maintenance work requests to determine that they were completed properly and were in conformance with applicable administrative procedures.

Within the areas inspected, no violations or deviations were identified.

8. Independent Inspection Effort (92706)

The inspectors routinely attended meetings with certain licensee management and observed various shift turnovers between shift supervisors, shift foreman, and licensed operators. These meetings and discussions provided a daily status of plant operating, maintenance, and testing activities in progress, as well as discussions of significant problems or incidents.

The inspectors, accompanied by their Section Chief, observed a complete shift crew turnover from the day shift to the oncoming evening shift. The oncoming shift crew briefing is held in the Technical Support Center (TSC) which is adjacent to the control room, but is defined as a part of the control room by Administrative Procedure AP-16, Conduct of Operations - Operations Group. The TSC is separated from the control room by a locked security door. The shift briefing is conducted by the oncoming shift supervisors for each unit. The off-going shift supervisor has already been relieved and has departed the control room area.

The inspectors noted that both shift supervisors are in the TSC for crew briefing at the same time with the control room security door closed. The inspectors questioned the practice of both shift supervisors being out of the physical control room area in the TSC at the same time. There are also two shift supervisors who are licensed on Unit 1 only and therefore cannot relieve the Unit 2 shift supervisor. These concerns were called to the attention of the licensee who initiated immediate corrective action by notations in the night order log book which requires that one shift supervisor shall be present in the control room area between the two security doors at all times and that shift crew briefings will be conducted by one of the shift supervisors. A shift supervisor who is licensed on both Units 1 and 2 will be required to stay in the control room area between the security doors. The licensee has revised AP-16 to incorporate the above administrative changes.

The inspectors had no further questions.

9. Engineered Safety Features System Walkdown (71710)

The inspectors walked down Units 1 and 2 Penetration Room Filtration (PRF) system to assess overall system operability. The inspectors reviewed the Final Safety Analysis Report (FSAR), Safety Evaluation Report (SER), Technical Specifications, system drawings and other documentation to determine if the as-built systems were in accordance with the applicable documentation. The inspectors had the following findings

- a. On November 28, 1984, at about 2 p.m., the inspectors found two PRF systems pathways obstructed in the Unit 2 elevation 100' piping penetration room. A 24 inch HVAC opening in the ceiling was filled with fire barrier silicon foam. Drawing D-205113, Rev. 11, HVAC System Auxiliary Building Plan Elevation 100', showed the ceiling penetration as an opening. Also, a 4 inch standpipe from the 2B Residual Heat Removal (RHR) pump room was covered with duct tape. The inspectors reported these findings to the Unit 2 shift supervisor.
- b. On November 29, 1984, at about 10 a.m., the inspector found an 8 inch PRF ventilation sleeve capped and welded shut. The sleeve ran between the waste evaporator feedpump room and the 100' piping penetration room. This sleeve provided the return path to the PRF fans from the RHR heat exchanger room, the 2A RHR pump room, and the rooms for the Waste Holdup Tank (WHT) and Floor Drain Tanks (FDT). The inspector informed an off-shift shift supervisor of the problem. The off-shift supervisor was in the vicinity. The licensee had tasked him with locating all PRF sleeves.
- c. The inspector observed no label plates near the PRF ventilation sleeves as required by drawing D-205111 (Unit 2) and D-175111 (Unit 2). Drawing D-205111 note 1 stated that "sleeves denoted by note 1 shall be used for inducing negative pressure in the room to which they are connected. These rooms are all within the penetration room filtration boundary." Note 2 required that these sleeves shall be provided with a label plate each side of wall reading "HVAC SLV. DO NOT BLOCK OFF." There was some question of whether the label plate requirement applied to only those sleeves that had a note 1 and a note 2 annotation since some Unit 2 sleeves only had a note 1 annotation on the drawing; however, the inspectors found no label plates regardless of the drawing annotation. Drawing D-175111, Unit 1, had both previous notes combined into one note; thus the label plate was required on all Unit 1 sleeves, annotated on the drawing with note 1.
- d. The licensee labeled the wrong door as the penetration room boundary on the 100' elevation (both units). FNP-2-SOP-60.0, Penetration Room Filtration System, Section 3.0 - Precautions and Limitations, states: "All penetration room boundary doors must be maintained closed except for normal entry and exit. Extended openings must be approved by the Shift Supervisor." With the wrong doors labeled, the licensee's administrative control of the doors was hampered.
- e. The as-built discharge ductwork for the PRF fans did not agree with the elevation drawing. Drawing D-205118 showed spoolpieces in the ductwork where none existed. System operability was not affected.
- f. On November 28, 1984, the inspector discovered 1B PRF prefilter differential pressure indicator off-scale low. The licensee was operating the system to filter the Unit 1 penetration room. The licensee wrote a work request to correct the problem.

- g. Further investigation by the licensee revealed other blocked PRF ventilation sleeves:

Unit 1

<u>Sleeve/Standpipe Location</u>	<u>Problem</u>
1B RHR pump room to piping penetration room (PPR)	Welded shut
FDT to WHT Rooms	Conduit thru sleeve

Unit 2

<u>Sleeve/Standpipe Location</u>	<u>Problem</u>
FDT to WHT Rooms	Welded Shut
2A CS* pump room to PPP	Contained silicon foam
2B CS* pump room to PPR	Contained silicon foam

The licensee examined all sleeves. Label plates were found near 3 sleeves, one of which was covered with paint.

*Containment Spray

- h. Conclusion of the inspectors:

- (1) The licensee could not produce any record of a safety evaluation to determine if a review was performed to ensure that the changes did not constitute an unreviewed safety question per 10 CFR 50.59. Flowpaths for the PRF system, as indicated by FSAR figure 6.2-94, were blocked as previously described in paragraphs a and g. This is unresolved item 348/84-29-01, 364/84-29-01.
- (2) The licensee failed to control and identify design interfaces. Ventilation sleeves were not labeled as required by system drawings. Construction electrical change notices were completed that hampered or may have hampered the operation of the PRF system. This is unresolved item 348/84-29-02, 364/84-29-02.
- (3) With two PRF Systems inoperable, the licensee should have placed the plant in a mode in which the PRF Systems are not required. This is unresolved item 348/84-29-03, 364/84-29-03. Items (1), (2) and (3) above are identified as an unresolved item pending the licensee's evaluation of the safety significance.

10. Action on Previously Identified Items (92701)

(Closed) AFW Control Valve Testing (348/364/84-20-02). License amendments 51 for Unit 1 and 42 for Unit 2 were issued on October 17, 1984. The

amendments deleted the words "during shutdown" to allow scheduling of the surveillance test without a plant shutdown.

(Closed) Stainless Steel Bolts in Carbon Steel AFW Check Valve Bonnet (348/84-20-04). No record existed which indicated that the licensee installed incorrect bolts without evaluation. The bolts were not pressure retaining. Anchor-Darling, by letter dated August 16, 1984, stated that the bolts did not perform a safety-related function.

(Closed) Incorrect Technical Specification page for hydrogen analyzers (364/84-28-02). The corrected page was issued by NRR on November 7, 1984.

The inspectors had no further questions.