

ENCLOSURE 1

NOTICE OF VIOLATION

Southern Nuclear Operating
Company, Inc.
Farley Nuclear Station

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

During an NRC inspection conducted on June 8 through July 10, 1992, violations of NRC requirements were identified. In accordance with "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 10 CFR 50, Appendix B, Criterion XVI, and the licensee's accepted Operations Quality Assurance Program, FSAR 17.2.16, require measures which assure prompt identification and correction of conditions adverse to quality, such as failures, deficiencies, and noncompliances. Additionally, for significant conditions adverse to quality, the measures are required to assure that the cause is determined and that corrective action is taken to prevent recurrence.

Contrary to the above, the licensee's measures did not assure prompt identification and correction of deficiencies in relay settings or in the procedures for establishing and verifying compliance with Technical Specification (TS) requirements for the relay settings. Further, the measures did not assure that the causes were promptly determined nor that corrective actions were taken to preclude recurrence of noncompliance with the TS surveillance test setting limits for the relays. The relay setting deficiencies were significant in that (1) the settings determine proper actuation of equipment for design accident mitigation, and (2) multiple instances of failures to comply with TS limits were experienced within a period of a few months. Examples of the deficiencies are as follows:

1. Although timing relay settings in three of four Engineered Safeguards System/Loss of Offsite Power load sequencers failed TS 4.8.1.1.2.c.9 testing during April 1991, and the cause had not been determined, the licensee returned to power without verifying the operability of the fourth (B2G).
2. Although sequencer timing relay calibration procedure deficiencies were identified as the cause of the above failures in September 1991, and the sequencer B2G relays had been calibrated with a deficient procedure, no measures were taken to assure that B2G settings met TS limits. In the next regularly scheduled TS test, over eight months later, B2G timing relays failed to meet the specified limits.

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3. The determination of the cause of the setting deficiencies for the timing relays, documented on Incident Reports 2-91-102 and -103 in September 1991, was inadequate in that:
 - It indicated there was not a generic problem, whereas five failures had occurred in one month and another apparently related failure remained undetected (i.e., B2G).
 - It failed to recognize two deficiencies in sequencer test procedures FNP-1/2-STP-80.3. First, there was no provision for re-centering settings found near the acceptance limits. Second, the potential measurement inaccuracy associated with the stopwatch timing employed by the procedures was excessive.
4. Although four 4.16 kV emergency bus undervoltage relays failed TS 3/4.3.2, Tables 3.3-4 and 3.3-5, trip voltage and response time setpoint tests in March/April 1992:
 - An investigation had only been initiated for one of the four failures.
 - Over four months later the investigation was not complete and the cause had not been documented.

This is a Severity Level IV violation (Supplement 1).

- B. 10 CFR 50, Appendix B, Criterion XII, and the licensee's accepted Operations Quality Assurance Program, FSAR 17.2.12, require that measures be established such that measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits.

Contrary to the above, the surveillance start timer, a device used to verify operability of each emergency diesel generator during surveillance testing, was not in a calibration program and there was no documentation of calibration of this device. The subject surveillance testing was performed to meet the requirements of Technical Specification 4.8.1.1.2 and was controlled through Surveillance Test Procedures such as FNP-0-STP-80.

This is a Severity Level IV violation (Supplement 1).

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- C. 10 CFR 50, Appendix B, Criterion V, and the licensee's accepted Operations Quality Assurance Program, FSAR 17.2.5, require that activities affecting quality be prescribed by and performed in accordance with instructions, procedures or drawings which include appropriate acceptance criteria for determining the activity is satisfactorily accomplished. The installation and inspection of supports which serve to prevent damage to safety-related equipment are activities affecting quality and, as such, must comply with this requirement.

Contrary to the above, installations of supports which serve to prevent damage to safety-related equipment were not prescribed by and/or were not performed in accordance with instructions, procedures or drawings which included the appropriate acceptance criteria. Examples were as follows:

1. Vent dryer tanks were located above Emergency Diesel Generator fuel oil transfer pumps where, if inadequately supported for a seismic event, they could fall and disable the safety-related pumps. The following conditions indicated support installation was inadequately prescribed by and/or performed in accordance with instructions, procedures or drawings containing appropriate acceptance criteria:
 - The installation was made in accordance with Change Notice SM-982 which showed the vent dryer tank to be mounted six inches above the fuel oil storage tank. Instead, it was installed approximately six feet above the fuel oil storage tank.
 - The vent dryer tank legs had been modified for the support arrangement without controlled drawings or instructions for assuring acceptable installation.
 - Bolted clips to aid in preventing movement of the dryer tanks on the supports were loose in some installations, and would not fully perform as intended.
2. Emergency Diesel Generator exhaust mufflers were not supported to permit appropriate thermal expansion during diesel operation, while precluding inappropriate movement of the mufflers to positions that might damage safety-related equipment or structures. The following

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conditions indicated support installation and subsequent inspections were inadequately prescribed by and/or performed in accordance with instructions, procedures or drawings containing appropriate acceptance criteria:

- Damage to the supports and to concrete beneath the supports was apparently due to thermal expansion and indicated the original installation was inadequate. For diesel 1B the support was visibly in contact with bolting that would restrain movement during muffler thermal expansion.
- Maintenance Procedure FNP-O-MP-12.2, "Diesel Generator Intake and Exhaust Visual Inspection", required a verification that the exhaust silencer (muffler) is free to slide through the thermal expansion support. Verifications had not been performed in accordance with the procedure, as they had failed to identify damage to structures and the supports caused by interferences which prevented free support movement during muffler heat up and expansion.

This is a Severity Level IV violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Southern Nuclear Operating Company, Inc. 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, 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 the 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. If an adequate reply is not received within the time specified in this Notice, an order or 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 extend the response time.

Dated at Atlanta, Georgia
this 9th day of September 1992