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Southern Nuclear Operating Company

the southern electric system

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10 CFR 2.201

Docket No. 50-364

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

Joseph M. Farley Nuclear Plant - Unit 2
Reply to the Notice of Violation
Report Number 50-364/92-20
Item Number 50-364/92-20-01
NRC Inspection of June 29 - July 24, 1992

Gentlemen:

This letter refers to the violation cited in the subject inspection report and includes comments on the subject inspection report. The violation states:

Technical Specification 6.8.1 requires that applicable written procedures recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, 1978 shall be established, implemented and maintained.

Procedure FNP-0-EIP-8, Emergency Communications, Appendix 1, Paragraph 3.4, Step 3.4.1, states, (for an expressed purpose of increasing Emergency Notification Network (ENN) system reliability), whenever an ENN location is inoperable, a backup form of communications, a tie between the Southern Company Services (SCS) teleconferencing bridge network and the ENN circuit, is to be established. Upon recognition of any specific location inoperability, (at any of fifteen different ENN locations), a request for SCS teleconferencing is to be made in 5 minutes. Step 3.4.3 of procedure EIP-8 further states that SCS should call back and ensure that the (backup) ENN connection has been made.

Contrary to the above, at approximately 1:30 p.m. on July 1, 1992, telecommunications (APCO - Network Operations Center) personnel removed the licensee Emergency Operating Facility (EOF) and Technical Support Center (TSC) ENN circuits from service without establishment of a backup ENN telecommunications network.

Telecommunications also failed to notify the plant shift supervisor, the operations manager and emergency planning personnel of these circuitry inoperabilities.

The circuits were returned to service by telecommunications at approximately 2:45 p.m. on July 1.

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Admission or Denial

The above violation is respectfully denied.

Basis for Disputing the Violation

The violation is cited for not establishing a backup for the TSC and EOF ENN phones when they were found inoperable during a routine test. FNP-0-CIP-8, Emergency Communications, paragraph 3.4.1 of Appendix 1 (attached), states:

"When an ENN location is inoperable, notify person with the malfunctioning unit to call SCS in 5 minutes [at 870-6305 or 821-6305 (for microwave)] and provide to SCS his name, title and location and request to be tied into circuit."

The intent of this paragraph is that if during usage of the ENN, one or more stations fail, the failed stations can be tied back into the ENN circuit using a Southern Company Services (SCS) teleconferencing bridge. The procedure would be for the TSC to inform the location with the failed unit to wait about 5 minutes and then for the failed unit location to call the SCS operator. During this 5 minute waiting period, the TSC would call and inform the SCS operator that the failed unit location is authorized to be reconnected to the ENN circuit. The failed unit location would then call the SCS operator, after the 5 minute waiting period, to be connected into the ENN circuit following a verification call back (paragraph 3.4.2).

The backup for the ENN for initial notification is the normal phone system, not the teleconferencing bridge.

In order to verify ENN system operability, loop checks are performed on a routine, scheduled basis. These routine loop checks do not require removal of the ENN system from operation. On July 1, 1992, Alabama Power Network Operations Center (NOC) notified the shift supervisor of the intended loop checks. Upon performing the loop checks at approximately 1:30 p.m., the NOC discovered the EOF and TSC ENN circuits were out of service. At the time of the loop checks, the EOF ENN was disconnected and the TSC ENN was locked in a communications cabinet. When not in use, these are their normal conditions by procedure. After discovering the two circuits out of service, the NOC took action to repair the two circuits and informed the shift supervisor when the service was restored.

Since paragraph 3.4.1 pertains to an ENN circuit which is in use and fails, and since the 5 minutes referenced in paragraph 3.4.1 pertains to a time duration which allows Farley personnel to contact Southern Company Services (SCS) and, subsequently, SCS personnel to establish a tie between a teleconferencing bridge (backup ENN) and the ENN circuit, the Notice of Violation is not appropriate.

Three items in the Notice of Violation are incorrect as follows:

1. The second paragraph of the violation states in part, "Procedure FN-0-IP-8, Emergency Communications, Appendix 1, Paragraph 3.4, Step 3.4.1, states, (for an expressed purpose of increasing Emergency Notification Network (ENN) system reliability), whenever an ENN location is inoperable. . . ." The parenthetical expression "(for an expressed purpose of increasing Emergency Notification Network (ENN) system reliability)" is not included in paragraph 3.4.1. This parenthetical expression should be deleted.
2. The second paragraph of the Notice of Violation implies that a request for tie-in is to be made within 5 minutes of the discovery of the inoperability of an ENN location. Actually, the 5 minute time frame is provided to the person with the malfunctioning unit so that he will wait 5 minutes to allow FNP sufficient time for contacting SCS and authorizing the bridge connection prior to the user calling. SNC has revised the procedure to clarify the precise intent of the 5 minute time frame.
3. The violation states that, "at approximately 1:30 p.m. on July 1, 1992, telecommunications (APCo - Network Operations Center) personnel removed the licensee Emergency Operating Facility (EOF) and Technical Support Center (TSC) ENN circuits from service without establishment of a backup ENN telecommunications network." Actually, on July 1, 1992 at 1:30 p.m., the TSC and EOF ENN phone lines were discovered out of service while performing routine loop checks. NOC did not take the lines out of service. By performing the loop check, the NOC discovered the ENN failure. The failure was caused by inadvertent disconnection of the ENN phone lines during APCo Southeast Division Telecommunications work earlier that day. NOC personnel had the phone circuits restored and then informed the shift supervisor after the repairs had been completed.

The NOC should have notified the shift supervisor of the out of service ENN circuits. They did not notify the SS because the NOC staff felt that they knew what the problem was and could effect repairs in a very rapid manner. The NOC staff did inform the shift supervisor prior to testing the ENN and again when the repairs had been completed.

The following corrective actions have been taken to ensure Southern Nuclear is made aware of problems discovered by NOC:

- o Based on the above discussion, NOC has changed their policies to inform the emergency planning coordinators in Birmingham or at the plant or the shift supervisor, as appropriate, of any failure associated with communications equipment.
- o Because the initial actions taken with NOC were verbal in nature, a memo has been sent to NOC for inclusion in their policies to formalize the importance of plant personnel being made aware of any problems associated with communications equipment as soon as NOC is aware of them.

- o Corrective action to prevent future inadvertent disconnection of the ENN phone lines during telecommunications work has been completed by APCo Southeast Division Telecommunications. Corrective action consisted of replacement of ENN phone line termination clips with red termination clips identifying the phone lines as critical communication circuits.

Corrective Action Taken and Results Achieved

Not Applicable

Corrective Steps to Avoid Further Violations

Not Applicable

Date of Full Compliance

Not Applicable

Additional Remarks

The cover letter for this Notice of Violation states the NRC is concerned "because it represents lax management control of plant operations for emergency notifications and it is yet another example of personnel error or failure to follow your approved procedures." We do not believe this is an example of plant operations personnel error or failure to follow procedures. Therefore "generic corrective actions to tighten up control of plant operation" is not warranted.

Additionally, item 7 of the inspection report, Evaluation of License Self-Assessment Capability, contains several statements which SNC believes to be incorrect and inappropriate and should be removed. The evaluation indicates that most of the PORC meeting was absorbed by the discussion of the corrective action report and that the PORC became the originator of the corrective action report, instead of the reviewer. The PORC did not originate the corrective action report since the document was distributed to the PORC in draft form for review prior to the meeting. In the meeting, PORC members commented on and revised the corrective action report. The evaluation further states, "recommendations made by the PORC to the plant general manager may be biased since he is the chairman of the committee." The evaluation indicates that the lack of PORC member independence could prove to be a weakness in the self-assessment capability. SNC does not agree with this comment. The PORC organization is delineated in the Farley Nuclear Plant technical specifications which are modeled under NUREG-0452, Standard Technical Specifications for Westinghouse Pressurized Water Reactors. SNC considers the FNP PORC composition to be an operational strength in that it focuses top level management's attention on significant issues related to nuclear safety.

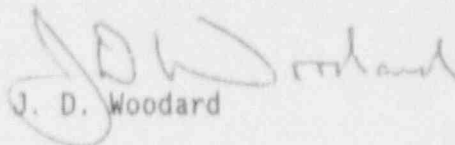
SNC requests that the discrepancies in the Inspection Report identified by this letter be removed and the Inspection Report reissued.

Confirmation

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.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY


J. D. Woodard

EFB:map 3151

Attachment

cc: Mr. S. D. Ebnetter
Mr. S. T. Hoffman
Mr. G. F. Maxwell

Sworn to and subscribed

before me this 18th day of

Sept. 1992.

My commission expires 5-22-93.