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Alabama Power
the southern electric system

September 28, 1984

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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
July 11 - August 15, 1984**

**RE: Report Numbers 50-348/84-20
50-364/84-20**

Dear Mr. Verrelli:

This letter refers to the violations, cited in the subject inspection reports, which state:

"The following violations were identified during an inspection conducted on July 11 - August 15, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. 10 CFR 50, Appendix B, Criterion II, Quality Assurance Program, as implemented by the Farley Nuclear Plant Quality Assurance Program, FSAR Section 17, requires that the quality assurance program shall provide control over activities affecting the quality of identified structures, systems and components to an extent consistent with their importance to safety.

Contrary to the above, inadequate protection and control of certain components important to safety was not exercised in that: (1) on July 25, 1984, an electrical switchgear compartment door was opened and automatically deenergized by licensee personnel without the knowledge or consent of the shift supervisor who is charged with the safe operation of the plant; (2) on July 16, 1984, a large manual valve operator was placed in an electrical cable tray on top of electrical cables while the valve was undergoing maintenance; and (3) on July 20, 1984 various electric cable

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tray covers were found bent, out of position, and covers not fastened to trays.

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

2. 10 CFR 50, Appendix B, Criterion XII "Control of Measuring and Test Equipment", as implemented by the Farley Nuclear Plant Quality Assurance Program, FSAR Chapter 17, requires that measures be established to assure that instruments used in activities affecting quality are properly calibrated and adjusted at specified intervals.

Contrary to the above, intervals for calibration of certain instruments used in safety related activities had not been specified in that on July 23, 1984, level indicators (LI-4075A and B) for the Unit 1 condensate storage tank had not been calibrated since March, 1981 and no calibration frequency was specified.

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

Admission or Denial

The above violations occurred as described in the subject reports.

Reason for Violaton

- 1) Item (1) of the first violation was caused by personnel error. An electrician opened a supply breaker compartment panel on motor control center 1F, thinking it was a spare cubicle. The MCC had a sign on it warning that opening the door would trip the MCC. The electrician failed to heed this sign.
- 2) Item (2) of the first violation was caused by personnel error in that the individuals involved failed to comply with instructions previously provided to maintenance group personnel concerning the misuse of cable trays for storage, stepping, etc.
- 3) Item (3) of the first violation was caused by personnel error in that inspection personnel carrying out the inspection program for cable trays failed to identify all discrepancies.
- 4) The second violation was caused by failure to incorporate new instruments, added in March, 1981 by design change, into the preventive maintenance program.

Corrective Action Taken and Results Achieved

- 1) The motor control center was reenergized. The individual was counseled.
- 2) The valve operator was removed from the cable tray. The cable tray and cables were visually inspected and determined to be free of damage. The personnel involved were counseled.
- 3) The accessible cable trays were inspected for damage and Maintenance Work Requests were submitted on the deficiencies that were found.
- 4) The instruments have been recalibrated.

Corrective Steps Taken to Avoid Further Violations

- 1) All electrical maintenance personnel have been re-instructed to heed signs on plant equipment. Since this specific motor control center has been inadvertently deenergized by other plant groups and is one of only two that have this trip feature, a design change will be investigated to determine if this trip feature can be removed.
- 2) All Maintenance Department personnel have been re-instructed concerning the abuse of cables and cable trays.
- 3) The periodic cable tray cover inspection list will be reviewed to ensure that all plant areas are included. This list will be revised to specify inspection by room number, rather than by building elevation.

The general employee training program and the annual requalification programs will be revised to include the following topics:

- (a) The importance of cable trays and covers and the consequences to safe plant operation that may result from their improper use will be stressed.
 - (b) The policy that any activity performed in the plant is governed by a controlling document will be stressed. This includes activities such as opening breaker cubicles, panels, covers, etc., which require approval of the Shift Supervisor if these activities could affect plant operation.
- 4) Since March, 1981, improved methods of review have been integrated into the design change process. Therefore, new post-accident monitoring instruments will be identified for inclusion in the preventive maintenance program.

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Plant Emergency Response Procedures will be reviewed and a list of instruments that are required for monitoring post-accident plant conditions will be developed. This list will be reviewed to ensure that each instrument is periodically recalibrated, either by surveillance test or by the preventive maintenance program.

Date of Full Compliance

October 31, 1984 (first violation)

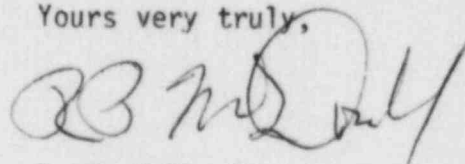
November 30, 1984 (second violation)

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,



R. P. McDonald

RPM/DSM:sam-F-2