



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

MAR 28 1985

Report Nos.: 50-348/85-13 and 50-364/85-13

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

Docket Nos.: 50-348 and 50-364

License Nos.: NPF-2 and NPF-8

Facility Name: Farley Nuclear Plant

Inspection Conducted: March 4 - 8, 1985

Inspection at Farley site near Dothan, Alabama

Inspector: R. R. Marston
R. R. Marston

3/22/85
Date Signed

Accompanying Personnel: A. L. Smith (PNL)

Approved by: Douglas M. Collins
for W. E. Cline, Section Chief
Division of Radiation Safety and Safeguards

3/26/85
Date Signed

SUMMARY

Scope: This routine, unannounced inspection entailed 78 inspector-hours on site in the areas of emergency preparedness.

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

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *J. D. Woodard, Plant Manager
- *L. N. Enfinger, Administrative Superintendent
- *R. D. Hill, Operations Superintendent
- *C. D. Nesbitt, Technical Superintendent
- K. W. McCracken, Superintendent of Regulation and Procedure Control
- *L. S. Williams, Training Director
- J. Beckham, Director, Visitor Center
- *W. G. Ware, SAER Supervisor
- *J. B. Hudspeth, Document Control Supervisor
- W. R. Bayne, Chemistry and Environmental Supervisor
- R. B. Wiggins, Training Supervisor
- N. M. Maddox, Technical Training Supervisor
- D. R. Bowen, Shift Supervisor
- W. E. Cumbee, Shift Supervisor
- B. L. Moore, Shift Supervisor
- D. E. Grissette, Environmental and Emergency Planning Supervisor
- R. H. Graham, Security Supervisor - Nuclear
- *J. F. Bouillon, Dosimetry Foreman
- W. T. Cooley, Security Training Coordinator
- A. Johnson, Sr. Engineer I, SAER
- R. M. Badham, SAER Engineer
- *J. B. Kelly, Emergency Planning Technician

Other licensee employees contacted included technicians and office personnel.

NRC Resident Inspector

- *W. H. Bradford

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on March 8, 1985, with those persons indicated in paragraph 1 above.

The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspector during this inspection.

3. Licensee Action on Previous Enforcement Matters

This subject was not addressed in the inspection.

4. Notification and Communication (82203)

Pursuant to 10 CFR 50.47(b)(5) and (6) and 10 CFR Part 50, Appendix E, Section IV.D, this area was inspected to determine whether the licensee was maintaining a capability for notifying and communicating (in the event of an emergency) among its own personnel, offsite supporting agencies and authorities, and the population within the EPZ.

The inspector reviewed the licensee's notification procedures; FNP-0-EIP-26 "Offsite Notification," FNP-0-EIP-8, "Notification Roster," the Emergency Plan and referenced documents. The procedures were consistent with the emergency classification and EAL scheme used by the licensee. The inspector determined that the procedures made provisions for message verification.

The inspector determined by review of applicable procedures and by discussion with licensee representatives that adequate procedural means existed for alerting, notifying, and activating emergency response personnel. The procedures specified when to notify and activate the onsite emergency organization, corporate support organization, and offsite agencies. Selected telephone numbers listed in the licensee's procedure (FNP-0-EIP-8) for emergency response support organizations were checked in order to determine whether the listed numbers were current and correct. No problems were noted.

The content of initial emergency messages was reviewed and discussed with licensee representatives. The initial messages appeared to meet the guidance of NUREG-0654, Sections II.E.3 and II.E.4. Licensee representatives stated that the format and content of the initial emergency messages had been reviewed by State and local government authorities.

The licensee's management control program for the prompt notification system was reviewed. According to licensee documentation and discussions with licensee representatives, the system consisted of three fixed sirens and 2,000 tone-alert radios. A review of licensee records verified that the system as installed was consistent with the description contained in the emergency plan. Maintenance of the system had been provided for by South East Division of Alabama Power. The inspector discussed siren test records with the licensee who verified that Houston County maintains siren test records. The licensee confirmed that an improved record keeping system was initiated in November 1984 and the records were available for the period November 1984 to February 1985. The records showed that silent tests were conducted every two weeks, growl tests quarterly, and a full-cycle test during the annual exercise as specified in NUREG-0654, Appendix 3.

Communications equipment in the Control Room, OSC, TSC, and EOF was inspected. Provisions existed for prompt communications among emergency response organizations, to emergency response personnel, and to the public. The installed communications systems at the emergency response facilities were consistent with system descriptions in the emergency plan and implementing procedures.

The inspector conducted operability checks on selected communications equipment in the Control Room, TSC, OSC, and EOF. No problems were observed. The inspector reviewed licensee records for the period January 1984 to December 1984 which indicated that communications tests were conducted at the frequencies specified in NUREG-0654, Section II.N.2.a. Licensee records also revealed that corrective action was taken on problems identified during communications tests.

Redundancy of offsite and onsite communication links was discussed with licensee representatives. The inspector verified that the licensee had established a backup communications system. It appeared that adequate communication systems were established to provide backup communications (both onsite and offsite) in the event that any one communication system failed. The various communication systems were described in the Emergency Plan, Section III.B., and included: Private Automatic Exchange (PAX), Off Premises Extension (OPX), Microwave System, Teletype System, Two-way Radios, Public Address and Party Lines, Sound Power Telephone, Plant Emergency Alarms, NRC Emergency Notification System (ENS), NRC Health Physics Network (HPN), State/Local Agency Emergency Notification Network (ENN) and Telecopiers. The inspector requested and observed an unannounced communications and notification check using the backup system. The inspector noted that the system operated properly and that the notification message used by the licensee representative followed the format prescribed in the licensee's procedures.

No violations or deviations were identified in this program area.

5. Changes To The Emergency Preparedness program (82204)

Pursuant to 10 CFR 50.47(b)(16), 10 CFR 50.54(q), and 10 CFR 50, Appendix E, Sections IV and V, this area was reviewed to determine whether changes were made to the program since the last routine inspection and to note how these changes affected the overall state of emergency preparedness.

The inspector discussed the licensee's program for making changes to the emergency plan and implementing procedures. The inspector reviewed the licensee's procedure FNP-O-AP-1, "Development, Review and Approval of Plant Procedures," governing review and approval of changes to the plan and procedures. The inspector verified that changes to the plan and procedures were reviewed and approved by management. The inspector noted that Procedure FNP-O-AP-1 did not specify that Emergency Implementing Procedures would be submitted to the NRC within 30 days of the effective date as required by 10 CFR 50, Appendix E, Section V. It was also noted that in the report of the annual audit of the emergency preparedness program (Item FNP-NC-7-85/4(16), dated February 16, 1985), a violation of the above regulation occurred in that changes to Emergency Implementing Procedures FNP-O-EIP-23, "Auxiliary Building Smoke Removal;" FNP-O-EIP-29, "Long Term Dose Assessment;" and FNP-O-EIP-30, "Post Accident Core Damage Assessment;" were not submitted to the NRC within the required 30 days. The inspector advised licensee representatives that the NRC considered this matter a licensee-identified violation of 10 CFR 50, Appendix E, Section V. During the exit meeting, a licensee representative stated that the referenced procedures had been sent to the NRC and that the NRC had already been added

to the standard distribution list for the Emergency Implementing Procedures. The inspector stated that the effectiveness of this corrective action would be evaluated during a subsequent inspection.

Inspection Followup Item (348, 364/85-13-01): Ensuring Changes to Emergency Implementing Procedures Are Sent to the NRC Within 30 Days.

Discussions were held with licensee representatives concerning recent modifications to facilities, equipment, and instrumentation. By review of selected procedures, the inspector verified that procedural and plan changes were made to reflect such recent modifications to the Emergency Plan for Inspection, Calibration and Testing of Emergency Equipment, quarterly update of telephone numbers and identifying specific training responsibilities.

The organization and management of the emergency preparedness program were reviewed. The inspector verified that there had been no significant changes in the emergency organization, however, some reassignment of responsibility for the plant and corporate emergency planning staffs had been initiated since the last inspection. The inspector's discussion with licensee representatives also disclosed that there had been no significant changes in the organization, however, there had been some staffing changes in the offsite support agencies since the last inspection. Examples of offsite staffing changes were the replacement for the Houston County Emergency Manager and changes in the NRC staffing. FNP-O-EIP-8 had been revised to show the changes.

The inspector reviewed the licensee's program for distribution of changes to the emergency plan and procedures. Document control records for the period November 1984 to February 1985 showed that appropriate personnel and organizations were sent copies of plan and procedural changes, as required.

No violations or deviations were identified in this program area.

6. Knowledge and Performance of Duties (Training)(82206)

Pursuant to 10 CFR 50.47(b)(15) and 10 CFR Part 50, Appendix E, Section IV.F, this area was inspected to determine whether emergency response personnel understood their emergency response roles and could perform their assigned functions.

The inspector reviewed the description (in the emergency plan) of the training program, training procedures, and selected lesson plans, and interviewed members of the instructional staff. Based on these reviews and interviews, the inspector determined that the licensee had established a formal emergency training program.

Records of training for key members of the emergency organization for the period December 1983 to March 1985 were reviewed. The training records revealed that personnel designated as alternates or given interim responsibilities in the emergency organization were provided with appropriate training. According to the training records, the type, amount, and frequency of training were consistent with approved procedures.

The inspector conducted walk-through evaluations with selected key members of the emergency organization. During these walk-throughs, individuals were given various hypothetical sets of emergency conditions and data and asked to respond as if an emergency actually existed. The individuals demonstrated familiarity with emergency procedures and equipment, and no problems were observed in the areas of emergency detection and classification, notifications, assessment action (to include plant conditions), and protective action decision-making.

No violations or deviations were identified in this program area.

7. Licensee Audits (82210)

Pursuant to 10 CFR 50.47(b)(14) and (16) and 10 CFR 50.54(t), this area was inspected to determine whether the licensee had performed an independent review or audit of the emergency preparedness program.

Records of audits of the program were reviewed. The records showed that an independent audit of the program was conducted by the Safety Audit and Engineering Review Group from January 7 to February 14, 1985. This audit fulfilled the 12-month frequency requirement for such audits. The audit records showed that the State and local government interfaces were evaluated. A licensee representative stated that findings would be made available to State and local government agencies by letter. Audit findings and recommendations were presented to plant and corporate management. A review of past audit reports and discussion with licensee representatives indicated that the licensee complied with the five-year retention requirement for such reports.

Licensee emergency plans and procedures required critiques following exercises and drills. Licensee documentation showed that critiques were held following periodic drills as well as the annual exercise. The records showed that deficiencies were discussed in the critiques, and recommendations for corrective action were made.

The licensee's program for follow-up action on audit, drill, and exercise findings was reviewed. Licensee procedures required follow-up on deficient areas identified during audits, drills, and exercises. The inspector reviewed licensee records dated November 1984 which indicated that corrective action was taken on identified problems, as appropriate. The licensee had established a tracking system as a management tool in following up on actions taken in deficient areas.

No violations or deviations were identified in this program area.

8. Inspector Follow-up (92701)

- a. (Closed) Inspector Follow-up Item (IFI) 348/83-28-03 and 364/83-26-03: Evaluate adequacy of inventory of operable high-range radiation survey meters under postulated accident conditions. The inspector reviewed documentation which showed an increase in number of high-range survey instruments. A licensee representative stated that instruments designated for emergency use were not used for training.

- b. (Closed) IFI 84-01-01: Need improvement in organization and formating of EIP-9 as it applies to prompt use of the procedure for protective action decisionmaking. The inspector reviewed EIP-9 and determined that it appeared to be effective for use to prompt protective action decisionmaking.
- c. (Closed) IFI 84-04-01: Add initial sheltering recommendation to EIPs for use upon declaration of General Emergency. The inspector determined that the initial protective action recommendation of sheltering had been added to both EIP-9 and EIP-19 for a General Emergency.