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October 28, 1991

Alabama Power
the southern electric system

Docket No. 50-348

10 CFR 2.201

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

Joseph M. Farley Nuclear Plant, Unit 1
Reply to Notice of Violation
Report Number 50-348/91-18-01, Revision 1
NRC Inspection of August 19 - September 17, 1991

Gentlemen:

This letter revises Alabama Power Company's previous reply to the subject violation dated October 25, 1991 in order to clarify the statement of admission.

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-AP-52, Equipment Status Control And Maintenance Authorization, Revision 16, Section 5.1, requires corrective maintenance to be requested and documented on a maintenance work request (MWR). Section 7.6 requires that prior to performing maintenance, proper unit or system conditions must be established, formal permission must be granted and an MWR must be filled out prior to releasing the system, subsystem, train, component or device.
>
> Procedure FNP-0-AP-14, Safety Clearance and Tagging, Revision 11, Section 3.14, states in part "Personnel shall not be used in lieu of (clearance) hold tags. Such live clearances are not adequate protection and are explicitly forbidden." Section 3.2, requires all operational and maintenance practices used in conjunction with safety clearance and tagging to comply with the applicable sections of the Alabama Power Company Safety and Health Manual. This manual, Section 102.04, Clearance Procedures - Electrical and Mechanical, requires employees to comply with written clearance procedures for the work to be performed and consider all installed mechanical equipment to be in service until the equipment has been properly tagged.

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> Contrary to the above, on August 27, 1991, at approximately 10:00 p.m., maintenance was initiated on the "1-2A" diesel generator (D/G) "A" air start system air compressor, without first obtaining an approved MWR. Additionally, a plant system operator was used as a "live clearance" to prevent operation of the D/G air start air compressor, in lieu of properly authorized hold tags.

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

Admission or Denial

The above violation occurred as described in the subject report. In addition to the procedures listed in the violation, Administrative Procedure FNP-0-AP-6, "Procedure Adherence," Revision 2, Section 5.1, states, "In cases of emergency, all personnel are authorized to depart from plant procedures provided that such departure is necessary to prevent injury to personnel, danger to the public, or damage to the facility." Section 5.4 requires, "At the termination of the emergency, an incident report shall be prepared by the person invoking the emergency changes... ."

At the time of the event described above, the 1C Diesel Generator was out of service. The 1C and 1-2A Diesel Generators supply Train A emergency power for both Units 1 and 2. If the 1-2A Diesel Generator had become inoperable, Train A emergency power for both units would have been unavailable. The Shift Supervisor evaluated the potential loss of both air compressors on the 1-2A Diesel Generator and decided that an emergency situation existed.

Reason for Violation

This violation was caused by personnel error in that the Shift Supervisor failed to document his actions per FNP-0-AP-6, "Procedure Adherence."

Corrective Action Taken and Results Achieved

An MWR was prepared documenting and functionally accepting the maintenance work performed. Deviation from FNP-0-AP-14 and FNP-0-AP-52 was documented on Incident Report Number (IR) 1-91-264 per FNP-0-AP-6.

Corrective Steps to Avoid Further Violations

This event has been discussed with all Shift Supervisors.

Date of Full Compliance

September 30, 1991

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.

Respectfully submitted,

ALABAMA POWER COMPANY

W. G. Hairston, III

WGH, III/BHW:map 1143

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