

Dave Morey
Vice President
Farley Project

Southern Nuclear
Operating Company
P.O. Box 1295
Birmingham, Alabama 35201
Tel 205.992.5131

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10 CFR 2.201

Docket Nos.: 50-348
50-364

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

Joseph M. Farley Nuclear Plant
Reply To a Notice Of Violation (VIO)
NRC Inspection Report Numbers 50-348/96-13 and 50-364/96-13

Ladies and Gentlemen:

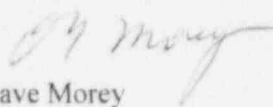
As requested by your transmittal dated December 23, 1996, this letter responds to VIO 50-348, 364/96-13-05, "Failure to Follow Radiation Work Permit For Use of Proper Protective Clothing," and VIO 50-348, 364/96-13-06, "Failure to Search Truck Trailer Prior To Entering Protected Area."

The Southern Nuclear Operating Company (SNC) responses are provided in the two enclosures. Enclosure 1 includes the response to VIO 96-13-05. Enclosure 2 includes the response to VIO 96-13-06.

Confirmation

I affirm that the response is true and complete to the best of my knowledge, information, and belief.

Respectfully submitted,


Dave Morey

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Enclosures

cc: Mr. L. A. Reyes, Region II Administrator
Mr. J. I. Zimmerman, NRR Project Manager
Mr. T. M. Ross, Plant Sr. Resident Inspector

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ENCLOSURE 1

VIO 50-348, 364/96-13-05

Failure to Follow Radiation Work Permit For Use of Proper Protective Clothing

Enclosure 1

VIO 50-348, 364/96-13-05, "Failure to Follow Radiation Work Permit For Use of Proper Protective Clothing," states the following:

Technical Specification (TS) 6.11 requires, in part, that procedures for personnel radiation protection be prepared consistent with the requirements of 10 CFR Part 20 and be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

Procedure FNP-O-M-001, Health Physics Manual, Revision (Rev.) 12, effective July 14, 1996, Section 6.4 requires any entry into the radiologically controlled area (RCA) to be governed by a radiation work permit (RWP).

RWP-096-0081, Waste Processing, requires for health physics support (HPS) personnel to use standard labcoat dressout, which included proper hand and shoe covers, for operation of the automatic laundry monitor (ALM) sending and receiving side.

RWP-096-0196, Special Plant Maintenance, effective October 1, 1996, requires standard coveralls dressout for entry into contaminated areas where kneeling or crawling across equipment or structures is necessary.

Contrary to the above, workers within the RCA failed to follow RWP procedures in that on October 24, 1996, a worker performing maintenance activities was observed kneeling and crawling within an area posted as contaminated without the required coverall dressout; and on October 26, 1996, a HPS individual was observed operating the ALM without the required hand and shoe protective clothing.

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

Admission or Denial

The violation occurred as described in the Notice of Violation.

Reason for Violation

The cause of the Radiation Work Permit (RWP) violations were personnel error in that personnel did not give adequate attention to the requirements of their RWP during performance of their work.

Corrective Steps Taken and Results Achieved

Both individuals were monitored for radioactive contamination with results being negative.

Corrective Steps That Will Be Taken to Avoid Further Violation

Each individual was coached on the need for strict adherence to RWP requirements.

A memo was sent to all plant groups addressing the need for increased awareness of proper radiological practices.

Health Physics personnel were directed to increase their awareness of Radiation Worker RWP compliance. In addition, the periodic observations of RWP compliance have been increased. Increased management involvement and additional corrective actions will be initiated as required based on the results of this program.

The increased level of attention for RWP compliance will be emphasized in the Radiation Worker Training Program.

Date of Full Compliance

February 7, 1997.

ENCLOSURE 2

VIO 50-348, 364/96-13-06

Failure to Search Truck Trailer Prior To Entering Protected Area

Enclosure 2

VIO 50-348, 364/96-13-06, "Failure to Search Truck Trailer Prior To Entering Protected Area," states the following:

The approved Farley Nuclear Plant Security Plan, Revision 32, Section 4.4.2, requires searching all vehicles, materials and packages prior to entering the protected area (PA), with certain exceptions established as Categories I through IV. Categories I and III would allow material, vehicles or packages to enter the PA without being searched as long as they are under continuous direct observation or positive controls are put in place.

Contrary to the above, on October 10, 1996, at about 4:00 p.m., security guards failed to search a Westinghouse sludge lance trailer prior to allowing it to enter the PA. Although a security guard escorted the trailer into the PA, he relinquished direct observation of the trailer shortly thereafter without establishing any positive controls (e.g., securing access to trailer with a lock). A day shift security guard returned to the trailer on the following day and conducted a search at that time.

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

Admission or Denial

The violation occurred as described in the Notice of Violation.

Reason for Violation

Procedural inadequacy in that the FNP Security Procedures did not adequately define positive control as it relates to materials allowed to enter without search, i.e. materials should have been locked or had a security officer posted.

On 10-10-96, a Security Officer was conducting a search of a Westinghouse sludge lance truck and trailer prior to its entry into the Protected Area. After searching the truck cab, the Security Officer asked the Health Physics Technician at the location if the truck's trailer (posted as a Radiological Control Area) could be searched. The Health Physics Technician informed the Security Officer that a Radiation Work Permit would have to be written and the Security Officer would need additional dosimetry devices. The Security Officer then asked for guidance from Security Supervision who incorrectly informed the officer that the radioactive cargo could be escorted into the Protected Area by Security prior to searching and that once the Health Physics group assumed control of the potentially radioactive material, Security could then be relieved of this duty. A Security Officer was then dispatched to the Protected Area gate and escorted the cargo to a location within the Protected Area as directed by Health Physics. The Security Officer remained with the cargo until relieved by Security Supervision after verifying the control of the trailer (potentially radioactive material) was relinquished to Health Physics. On 10-11-96, Security conducted a search of the trailer and contents which did not disclose any prohibited items.

Corrective Steps Taken and Results Achieved

Security personnel were instructed that a Security Officer will remain posted with radioactive materials allowed to enter the protected area until a search is conducted.

Corrective Steps That Will Be Taken to Avoid Further Violation

FNP-0-SP-14, Search and Seizure, has been revised to clarify the positive control measures to be taken when materials are allowed to enter the protected area prior to search.

Security personnel will be trained on the revisions to FNP-0-SP-14.

Date of Full Compliance

January 14, 1997.