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MAR 10 1988

Docket Nos. 50-348 and 50-364
License Nos. NPF-2 and NPF-8
EA 88-33

Alabama Power Company
ATTN: Mr. R. P. McDonald
Senior Vice President
Post Office Box 2641
Birmingham, Alabama 35291-0400

Gentlemen:

SUBJECT: NOTICE OF VIOLATION
(NRC INSPECTION REPORT NOS. 50-348/88-02 AND 50-364/88-02)

This refers to the Nuclear Regulatory Commission (NRC) inspection conducted by T. R. Collins at the Farley Nuclear Plant on January 4-6, 1988. The inspection included a review of the circumstances surrounding the unauthorized entry into a radiation exclusion area which was identified by your staff and reported to the NRC on January 30, 1987. The report documenting this inspection was sent to you by letter dated February 8, 1988. As a result of this inspection, significant failures to comply with NRC regulatory requirements were identified, and accordingly, NRC concerns relative to the inspection findings were discussed in an Enforcement Conference held on February 17, 1988. The letter summarizing this Conference was sent to you on March 2, 1988.

The violations described in the enclosed Notice of Violation involved failures to adequately control access to a high radiation area, failures to comply with procedures for access control to radiation areas including a radiation work permit system, and failure to adequately instruct individuals on the limitations and precautions for working in or frequenting a restricted area. The events that resulted in these violations included a contractor providing decontamination support on December 28, 1987, following the fifth refueling outage. One of the rooms requiring decontamination was Room 450 which was located in the Unit 1 Auxiliary Building. This room contained high radiation areas and provided the only access to Room 449, where the spent fuel pool demineralizer was located. The "boundary" between these two rooms was neither obvious nor clearly established. Room 449 and a portion of Room 450 were considered to be an exclusion area, defined as an area having radiation fields greater than 1 rem per hour. The entrance to the exclusion area was not locked, although it was barricaded by three yellow and magenta ropes and high radiation area/exclusion area warning signs. A flashing red light was also located at the exclusion area boundary. Radiation fields in the exclusion area ranged from 5 to 240 rem per hour at contact with the spent fuel pool demineralizer and approximately 150 rem per hour at 18 inches from the surface of the tank. Moments after a contract decontamination foreman unlocked the door to Room 450, a health physics technician entered the room. Subsequently, as a result of miscommunications, two contract decontamination workers entered the room to perform decontamination activities. One worker crossed the exclusion area boundary and worked in an area approximately five feet from the spent fuel

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pool demineralizer. After approximately five minutes, this worker observed that his low range dosimeter was offscale and immediately exited the room and reported to a health physics technician.

This event resulted in an unplanned exposure that violated Farley's administrative dose control of 375 millirem per week. Although the exposure to the worker during the incident was assessed at 455 millirem to the whole body, which is less than the NRC limits, the NRC is concerned that these violations created a significant potential for personnel exposures in excess of NRC limits. The serious nature of this event indicates the need for improvements in the administration and control of your Radiation Safety Program, in maintaining adequate communications, and of your training program to ensure the safe performance of licensed activities and adherence to NRC requirements.

During the Enforcement Conference, you indicated that the use of the rope barrier, high radiation area warning signs, and a flashing light as a warning device were adequate to control access to the areas of Room 450/449 that were in excess of 1,000 millirem per hour and that these controls were permitted by your Technical Specifications. Technical Specification 6.12.2 does permit access to individual areas with dose rates in excess of 1,000 millirem per hour which are located within larger areas, such as PWR containments, to be controlled by roping off this area, conspicuously posting this area, and activating a flashing light as a warning device only if no enclosure exists for purposes of locking and no enclosure can be reasonably constructed around the individual area. It is our position that a lockable barrier could have been constructed at the access to the exclusion area. Therefore, the use of the rope barrier and the flashing light were inappropriate to control access to the exclusion area in Room 450/449.

In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987) (Enforcement Policy), the violations described in the enclosed Notice have been categorized as a Severity Level III problem. Normally, a civil penalty is proposed for a Severity Level III violation or problem. However, after consultation with the Director, Office of Enforcement, and the Deputy Executive Director for Regional Operations, I have decided that a civil penalty will not be proposed in this case because of your prior good performance in the area of concern. You received a rating of category 1 for the past five Systematic Assessment of Licensee Performance periods, and no escalated enforcement actions were taken for problems in this area during these periods. In addition, during the past two years, only one Severity Level IV violation has been cited involving failure to wear the protective clothing required by the radiation work permit.

You are required to respond to this letter and the enclosed Notice and should follow the instructions specified therein when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

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The responses directed by this letter and its enclosure are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Should you have any questions concerning this letter, please contact us.

Sincerely,

**ORIGINAL SIGNED BY:
J. NELSON GRACE**

J. Nelson Grace
Regional Administrator

Enclosure:
Notice of Violation

cc w/encl:

- W. O. Whitt, Executive Vice President
- J. D. Woodard, General Manager -
Nuclear Plant
- W. G. Hairston, III, Vice President -
Nuclear Support
- J. W. McGowan, Manager-Safety Audit
and Engineering Review
- S. Fulmer, Supervisor-Safety
Audit and Engineering Review

Alabama Power Company

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bcc w/encl:
WRC Resident Inspector
E. Reeves, Project Manager, NRR

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