NT-88-0134

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March 21, 1988

Docket No. 50-348
Docket No. 50-364

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

SUBJECT: Reply to a Notice of Violation
J. M. Farley Nuclear Plant NRC Inspection of
January 12 - February 10, 1988

RE: Report Number 50-348/88-03
50-364/88-03

Dear Sir:

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

"During the Nuclear Regulatory Commission (NRC) inspection conducted on January 12 - February 10, 1988 violations of NRC requirements were identified. The violations involved procedural violations and a violation of fire protection Technical Specification 3.7.11.2. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the violation is cited below:

A. 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.

Contrary to the above, the following examples of deficient procedural implementation or adequacy were noted.

1. Procedure 1-SOP-8.1, High Head Safety Injection System, check list 1-SOP-8.1A, requires breaker FA-M4 in Motor Control Center (MCC) 1A, for boron injection surge tank heater, to be in the closed position. During power operation on January 20, 1988 breaker FA-M4 was in the open position.

2. Procedure 2-SOP-24, Service Water System, check list 2-SOP-24.0A requires breaker HKL-J3 in MCC 1K, cooling and lubrication strainer to Train A service water pumps, to be in the closed position. During power operation on January 27, 1988 Breaker HKL-J3 was in the open position.

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3. Procedure 1-SOP-24, Service Water System, check list 1-SOP-24.0A requires breaker HKL-K4 in MCC 1K, for cooling and lubrication strainer to the Train A service water pumps, to be in the closed position. During power operation on January 27, 1988 Breaker HKL-K4 was in the open position.

4. Procedure 2-SOP-50.6, Liquid Waste Processing System Miscellaneous Sump Pump and Retaining Basin Operation, check list 2-SOP-50.6A, requires breaker HCC-D5 in MCC 2CC, to sump pump N2W09505B-N for safety related valve pit 2VB-2, to be in the closed position. During power operation on January 27, 1988 Breaker HCC-D5 was in the open position.

5. Technical Specification surveillance requirement 4.7.4 requires that the service water system be demonstrated operable by verifying that each accessible valve (manual, power operated or automatic) in the flow path, servicing safety related equipment that is not locked, sealed or otherwise secured in position, is in its correct position at least once per 31 days.

   During power operation on February 5, 1988 the service water lube and cooling water piping systems on Unit 1 and Unit 2 were not included in FNP-1-2-STP-24.5, Service Water Flow Path Verification.

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

B. Technical Specification 3.7.11.2 requires the fire suppression system (spray and/or sprinkler system) be operable whenever the equipment in the protected areas is required to be operable. The Action statement states that, with one or more of the above required spray and/or sprinkler systems inoperable, within one hour establish a continuous fire watch with backup fire suppression equipment for those areas in which redundant systems or components could be damaged; for other areas, establish an hourly fire watch patrol.

   Contrary to the above, on January 19-20, 1988 the required fire watches were not initiated. Unit 1 fire suppression system was inoperable for approximately 14 hours when the fire protection panel switch was inadvertently placed in the over ride position. The fire detection system remained operable.

   This is a Severity Level IV Violation (Supplement I)."

Admission or Denial

The above violations occurred as described in the subject reports.

Reason for Violations

A. This violation was caused by personnel error in that the breakers mentioned in Items 1-4 were opened without proper documentation or

controls, in violation of the applicable system operating procedure alignment requirements. Item 5 was also caused by personnel error in that when the Service Water Flow Path Verification Procedure was developed, the Service Water lubrication and cooling system was not considered to be part of the Service Water main flow path verification. In retrospect, after the inspector pointed out the deficiency, it was recognized that the lubrication and cooling should be part of the flow path verification.

B. As discussed in LER 88-002-00 Unit 1 (Docket Number 05000348), this violation was caused by personnel error in that an individual failed to ensure that the switch was in the correct position. A contributing factor to the event was that the key switch was faulty. The master override switch is key-operated. It should allow the key to be removed only when in the normal position. However, the key switch malfunctioned and enabled the key to be removed from the override position.

Another contributing cause was that the control room fire protection system trouble alarm, which originates from the fire protection Pyrotronics panel trouble alarm, was defeated. The trouble alarm was annunciating continuously due to trouble in a smoke detector circuit. A maintenance work request had been originated to correct this problem. When the master override switch is in the override position, a trouble alarm is generated. However, since the trouble alarm was already alarming, no annunciation resulted from the switch being left in override. Therefore, the control room operators could not have been aware that the switch was in the override position.

Corrective Action Taken and Results Achieved

A. The breakers were closed in accordance with system operating procedure guidance. Electrical system breaker checklists were performed on both units. Also, a Service Water flow path position verification was performed on the lubrication and cooling valves and all of them were found to be in the correct position.

B. The override switch was reset, returning the Pyrotronics panel to normal.

Corrective Steps to Avoid Further Violations

A. A formal operation memorandum is being sent to Operations, Electrical Maintenance, and Instrumentation and Controls personnel to re-instruct them that repositioning breakers should not be done without proper documentation, i.e., utilizing a maintenance work request, tagging operations order, or approved procedure. Procedures FNP-1/2-STP-24.5, Service Water Flow Path Verification, are being changed to include the Service Water lubrication and cooling valves in the flow path.

B. The system operator involved has been counseled concerning this event. The problem with the smoke detector system which caused the system trouble alarm to annunciate has been repaired. The master override switch will be repaired.

Date of Full Compliance

April 29, 1988

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:emb

cc: Mr. L. B. Long
Dr. J. N. Grace
Mr. E. A. Reeves
Mr. W. H. Bradford