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July 9, 1997

Docket Nos.: 50-348
50-364

10 CFR 2.201

U.S. Nuclear Regulatory Commission
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Washington, DC 20555

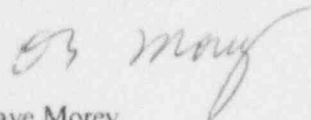
Joseph M. Farley Nuclear Plant
Reply To Notice Of Violation (VIO)
NRC Inspection Report Numbers 50-348/97-05 and 50-364/97-05

Ladies and Gentlemen:

As requested by your transmittal dated June 9, 1997, this letter responds to VIO 50-348, 364/97-05-01, "Failure to Notify NRC of Change of Licensed Operator Medical Status," VIO 50-348, 364/97-05-03, "Failure to Follow Multiple TS Surveillance Requirements," and VIO 50-348/97-05-05, "Failure to Control the Special Process of Welding." The Southern Nuclear Operating Company (SNC) response to each VIO is provided in the enclosures.

Should you have any questions, please advise.

Respectfully submitted,


Dave Morey

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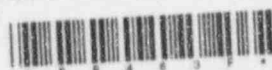
Enclosures:

1. VIO 50-348, 364/97-05-01
2. VIO 50-348, 364/97-05-03
3. VIO 50-348/97-05-05

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, 364/97-05-01

"Failure to Notify NRC of Change of Licensed Operator Medical Status"

ENCLOSURE 1

VIO 50-348, 364/97-05-01, "Failure to Notify NRC of Change of Licensed Operator Medical Status," states:

"10 CFR 55.25 states, 'If, during the term of the (an operator's) license, the licensee develops a physical or mental condition that causes the licensee to fail to meet the requirements of paragraph 55.21 of this part, the facility licensee shall notify the Commission within 30 days of learning of the diagnosis. For conditions for which a conditional license (as described in paragraph 55.33(b) of this part) is requested, the facility licensee shall provide medical certification on Form NRC 396 to the Commission (as described in paragraph 55.23 of this part).' Also, 10 CFR 50.74 states, 'Each (facility) licensee shall notify the Commission in accordance with paragraph 50.4 within 30 days of the following in regard to a licensed operator or senior operator: ... (c) Disability or illness as described in paragraph 55.25 of this chapter.'

Contrary to the above, on March 21, 1995, the facility licensee's physician made the determination a licensed operator's eyesight no longer met the minimum standards required by paragraph 55.33 (a)(1) as measured by the standards of ANSI/ANS-3.4-1983. The facility licensee failed to notify the Commission of the change in medical status of the operator within 30 days as required by 10 CFR 55.25 and 10 CFR 50.74.

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

Admission or Denial

The violation occurred as described in the Notice of Violation.

Reason for Violation

Personnel error in that the NRC Licensed Operator Review Form requirements were not properly completed due to a transcription error. An individual's form was marked no restriction change from previous submittal, but there was actually a change in restrictions from the previous submittal.

Corrective Steps Taken and Results Achieved

The individual's license has been revised to require that corrective lenses be worn when performing licensed duties. During the time frame when the individual was not restricted, the individual's license was in an inactive condition. A review of all other licensed individuals' medical records has disclosed that their licenses accurately described any required restrictions.

Enclosure 1
VIO 50-348, 364/97-05-01

Corrective Steps That Will Be Taken to Avoid Further Violation

SNC has revised the procedure for review of the NRC Licensed Operator Review Form to require a second person review of NRC Form 396 to ensure that any change from the previous submittal is identified. This error was discussed with the individual concerned by the Training Manager.

Date of Full Compliance

June 16, 1997

ENCLOSURE 2

VIO 50-348, 364/97-05-03

"Failure to Follow Multiple TS Surveillance Requirements"

ENCLOSURE 2

VIO 50-348, 364/97-05-03, "Failure to Follow Multiple TS Surveillance Requirements," states:

"Technical Specification (TS) 4.0.4 requires that entry into an Operational Mode shall not be made unless the Surveillance Requirements associated with the Limiting Conditions of Operation (LCO) have been performed within the stated surveillance interval.

TS Surveillance Requirement 4.3.1.1 requires that each reactor trip system instrumentation channel be demonstrated operable per TS Table 4.3-1. Functional Unit 6 of TS Table 4.3-1 requires quarterly channel functional tests and shiftly channel checks of the nuclear instrumentation system (NIS) source range (SR) channels for Modes 2, 3, 4, and 5.

Functional Unit 2.B of TS Table 4.3-1 requires a quarterly channel calibration of the NIS power range (PR) channels' low flux trip for Mode 2.

TS SR 4.8.1.1.2.c.8 requires verifying every 18 months that a simulated safety injection signal, while the emergency diesel generator (EDG) is operating in a test mode (connected to its bus), overrides the test mode and returns the EDG to standby operation for Modes 1, 2, 3, and 4.

Contrary to the above, the licensee identified the following TS surveillance requirements that were not being performed as required:

- a) On March 15, 1997, Unit 1 entered Mode 2 and then Mode 3 without accomplishing the surveillance requirements of TS Table 4.3-1 Functional Unit 6 for NIS SR channels. The TS surveillance requirements were not fully met until March 18 while the unit was in Mode 5. Failure to meet these TS surveillance requirements has occurred in the past during previous Unit 1 and 2 shutdowns.
- b) On March 15, 1997, Unit 1 entered Mode 2 without accomplishing the surveillance requirements of TS Table 4.3-1 Functional Unit 2.B for NIS PR low neutron flux trip. Unit 1 entered Mode 3 approximately seven minutes later, at which time the NIS PR channels were no longer required to be operable. Failure to meet this TS surveillance requirement has occurred in the past during previous Unit 1 and 2 shutdowns.
- c) On April 23, 1997, with Unit 2 in Mode 1, it was determined that the Unit 2 TS surveillance requirement 4.8.1.1.2.c.8 for the shared A train EDGs had not been accomplished on Unit 2. Historically, this surveillance requirement for the shared EDGs had only been performed on Unit 1. The Unit 2 surveillance requirement was successfully performed on April 24 for the 1-2A EDG and on April 25 for the 1C EDG.

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

Admission or Denial

Condition a) and b)

The violations occurred as described in the Notice of Violation.

Condition c)

The violation occurred as described for the 1-2A Diesel Generator (DG). However, as previously reported in LER 97-003 (Unit 2), in the case of the other shared A Train DG (1C), a review of plant procedures determined that sufficient testing overlap existed to take credit for the completion of the subject surveillance requirement and no adverse condition existed for the 1C DG.

Reason for Violation

The cause of these events was cognitive personnel error and procedural inadequacies.

Condition a)

Failure to meet TS Table 4.3-1 Functional Unit 6 functional test requirement resulted from inadequate test procedures. Failure to meet the channel check requirement was due to a failure to identify an inconsistency existing within TS.

Condition b)

Failure to meet TS Table 4.3-1 Functional Unit 2.B calibration resulted from a failure to ensure the surveillance requirements for mode changes during a shutdown were incorporated into plant procedures. The Power Range surveillance test procedures test both the high and low setpoint trips. The applicable section of these procedures for testing the low setpoint trip are not required to be performed if the plant is in Mode 1. Due to additional startup surveillance requirements, a functional surveillance of the low setpoint trip is verified prior to startup. However, there was no procedural requirement to ensure performance of the low setpoint trip if the unit was scheduled to be shutdown. Therefore, when the surveillance test was last performed prior to the Unit 1 shutdown, only the high setpoint trip was tested since the unit was in Mode 1.

Condition c)

Failure to meet the TS requirement to perform the 1000KW load rejection on 1-2A DG while connected to the Unit 2 bus resulted from procedural inadequacy in that the Shared (Unit 1 and 2) Surveillance Schedule did not provide sufficient guidance to ensure that required testing was being performed for each Unit individually.

Corrective Steps Taken and Results Achieved

Condition a)

Unit 1 source range channels were verified to be in operation per the Unit Operating Procedure when neutron flux decreased below Permissive P-6 on March 15, 1997. Unit 1 quarterly functional source range testing was completed for NI-32 on March 18, 1997, which satisfied the Technical Specifications requirement for one operable channel in the Mode existent at that time.

Condition b)

No short term corrective actions were required since Unit 1 left the applicable Mode of the missed surveillance by entering Mode 3 approximately 7 minutes after entering Mode 2.

Condition c)

The 1000 KW load rejection test was performed on Unit 2 for DG 1-2A on 4/23/97.

Corrective Steps That Will Be Taken to Avoid Further Violation

Reviews have been performed to determine the completeness and adequacy of plant procedures in fulfilling Technical Specifications (TSs) Surveillance Requirements (SRs) to ensure compliance with TSs prior to any Mode changes.

Unit Operating Procedures (UOPs) have been changed to add verification points within the procedures to ensure all required SRs are satisfied prior to entry into a different Mode.

Condition a)

Southern Nuclear Operating Company (SNC) has discussed the inconsistency in the TSs with Nuclear Reactor Regulation concerning the requirement to perform source range channel checks prior to the channels being energized at Permissive P-6. SNC has submitted a Technical Specifications amendment request to address this inconsistency.

Condition a) and b)

Power range and source range test procedures were modified to include Mode 1 as a condition requiring the performance of the subject tests. These tests were performed on Unit 2 while in Mode 1 to make the surveillances current for a Mode change if required. The tests were performed on April 18 and 19, 1997.

A contributing cause to not meeting all the source range and power range surveillance requirements was that the FSAR did not sufficiently describe the testing required by Technical Specifications; therefore, FSAR changes were made.

Enclosure 2
VIO 50-348, 364/97-05-03

Condition c)

The Shared (Unit 1 and 2) Surveillance Schedule has been changed to ensure that the shared FNP procedure implementing this SR (FNP-0-STP-80.8, "Diesel Generator 1-2A 1000 KW Load Rejection Test," and FNP-0-STP-80.9, "Diesel Generator 1C 1000 KW Load Rejection Test") has been performed with the A train DG connected to each individual Unit prior to taking surveillance credit for that Unit.

Date of Full Compliance

June 30, 1997

ENCLOSURE 3

VIO 50-348/97-05-05

"Failure to Control the Special Process of Welding"

ENCLOSURE 3

VIO 50-348/97-05-05, "Failure to Control the Special Process of Welding," states:

"10 CFR 50, Appendix B, Criterion XI, requires measures be established to assure that special processes including welding are controlled in accordance with applicable codes and other special requirements. FNP-0-SPP-GW-002, Revision 18, 'General Welding Standard For Pressure Boundary Applications,' paragraph 8.6 b. states, 'There are no indications of excessive cold spring at the time of joint fit-up.' Procedure FNP-0-SPP-WP-030, 'Specification for Welder Qualification for Pressure Boundary Applications,' Revision 15, requires the thickness of side bend specimens to be 3/8-inch thick with no tolerance. FNP-0-SPP-WF-001, Revision 12, 'Procedure for Welding Filler Material Control,' Paragraph 8.4 states, 'Work areas shall be kept clear of unauthorized, unidentified or discarded welding filler materials.' FNP-0-SPP-WF-001, Revision 12, 'Procedure for Welding Filler Material Control,' Paragraph No 8.1 states, in part, '...it is the responsibility of the welder to maintain control of filler materials until used, discarded or returned to the storeroom.'

Contrary to the above, as of April 18, 1997, the licensee failed to establish adequate measures to assure that special processes including welding were controlled in accordance with applicable codes and other special requirements as evidenced by the licensee's: introduction of unknown stress levels into safety-related piping systems; failure to conduct bend testing on welder test assemblies in accordance with ASME B&PV Code Section IX; and failure to control welding filler materials.

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

Admission or Denial

The violation occurred as described in the Notice of Violation.

Reason for Violation

- 1) Procedural inadequacy, in that the procedure did not provide clear guidance for the term "excessive" as it applies to closure gaps. This had been previously left up to the skill of the craftsman.
- 2) Procedural inadequacy, in that the procedures did not provide tolerance values for the preparation of welding test specimens. It was believed that, since ASME Section IX described the value as approximate, a specific tolerance was not required.
- 3) Personnel error, in that the filler metal control procedure was not followed by the contractor welders, due to failure of supervision to ensure accountability of the welders for this task.

Corrective Steps Taken and Results Achieved

- 1) The closure gaps were evaluated by SCS engineering and concluded as being acceptable.
- 2) Welder qualification test specimens, which were made by the Powerhouse Maintenance Contractor welders for U1R14, were measured, and twelve specimens were found to be less than 3/8-inch thick. The largest deviation was 1/32 inch. An evaluation was performed considering the largest indication on the undersized test specimens, and the specimens and welder qualifications were found to be acceptable.
- 3) The unattended filler material was removed from the work area and discarded per procedure FNP-0-SPP-WF-001.

Corrective Steps That Will Be Taken to Avoid Further Violation

- 1) The Special Processes Manual, FNP-0-M-23, has been revised, changing procedure FNP-0-SPP-GW-002 to require differences in piping alignment to be evaluated by engineering personnel prior to welding. The requirements for piping alignment will be included in the Powerhouse Maintenance Contractor's welder training program and will be reviewed with the SNC welders.
- 2) The Special Processes Manual, FNP-0-M-23, has been revised, changing procedures FNP-0-SPP-WP-030 and FNP-0-SPP-WP-031 to provide a tolerance for the welder qualification test specimen thickness. Welder qualification personnel have been instructed to document acceptable test specimen thickness prior to bending.
- 3) The Powerhouse Maintenance Contractor will emphasize to the welders, in their in-processing training program, the importance of filler material control and procedure adherence.

Date of Full Compliance

September 1, 1997