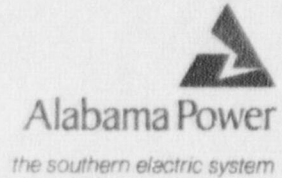


Alabama Power Company
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Telephone 205 868-5581

W. G. Haireton, III
Senior Vice President
Nuclear Operations



August 24, 1989

Docket Nos. 50-348
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
May 9 - 10, 1989

RE: Report Numbers 50-348/89-13-01
50-364/89-13-02

Gentlemen:

This letter refers to the violations cited in the subject inspection report which states:

"During the Nuclear Regulatory Commission (NRC) inspection conducted on May 9-10, 1989, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, 53 Fed. Reg. 40019 (October 13, 1988), the violations are listed below:

- A. Facility Operating License Nos. NPF-2 and NPF-8, Sections 2.B.(4), authorize Alabama Power Company to receive, possess and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration, or associated with radioactive apparatus or components.

Contrary to the above, on April 29, 30, and May 1, 1989, licensee personnel affixed byproduct material to United States currency in an effort to identify anticipated theft of the currency, a use of byproduct material not authorized by the operating licenses.

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

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

Plant Procedure FNP-O-M-001, Health Physics Manual, Section 4.1.1.7, requires that individuals know and follow the Radiation Work Permit requirements for work being performed.

Contrary to the above, May 7, 1989, a plant operator was observed by an NRC Resident Inspector entering an area posted as a high radiation area without a required digital alarming dosimeter or a health physics technician with a dose rate instrument, who will survey the work area at the start of work and periodically thereafter.

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

Admission or Denial

- A. The above violation occurred as described in the subject reports. However, it should be noted that these two incidents were not independent events in that the helper who contaminated the \$5.00 bill had prior knowledge of the contaminated \$1.00 bill.
- B. The above violation occurred as described in the subject reports. However, a survey taken after the incident determined that the area was not a high radiation area. Also, it was ascertained that the system operator (SO) received a maximum of ten mrem on the day of the incident (followup TLD result was 80 mrem for the month of May).

Reasons for Violations

These violations were caused by:

- A. Personnel error in that the health physics foremen, technicians, and the helper involved in this incident failed to meet their duties and responsibilities.
- B. 1. Personnel error in that, although the Radiation Work Permit (RWP) allows certain deviations with the permission of health physics supervision, the SO calling to obtain permission to deviate from the RWP did not clarify his request.
2. Procedural inadequacy in that there was no procedural requirement to ensure that the individual obtained authorization from health physics supervision.

Corrective Action Taken and Results Achieved

- A. 1. The contaminated \$1.00 bill and the contaminated corners removed from the \$5.00 bill were secured in the radioactive source locker. It was verified that none of these items left the FNP radiation controlled area.

2. An exposure evaluation was performed on the radioactivity attached to both bills. This evaluation determined that negligible radiation exposure to personnel resulted from this event.
 3. Personnel directly involved in the incident were counseled by health physics supervision and FNP management.
- B. The SO's access to the radiation controlled area was suspended. He was counseled by plant management prior to reinstatement of his radiation controlled area access.

Corrective Steps To Avoid Further Violations

- A. 1. Plant management conducted meetings and discussed the incident with the health physics and waste and decontamination personnel emphasizing that the unauthorized use of radioactive material cannot be tolerated.
 2. Improper use of byproduct material will be added to the health physics initial training and retraining courses for technicians and foremen and to the radiation worker training course for general employees.
 3. A statement concerning improper use of byproduct material will be added to health physics procedure(s).
- B. An RWP change authorization log will be implemented which will allow a person on a job to call the health physics foreman, obtain a change to an RWP, and receive an authorization number as proof of the change.

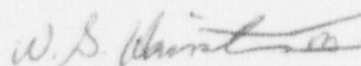
Date of Full Compliance

- A. October 1, 1989
- B. September 1, 1989

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,



W. G. Hairston, III

WGH,III/emb/4.44

cc: Mr. S. D. Ebnetter
Mr. E. A. Reeves
Mr. G. F. Maxwell