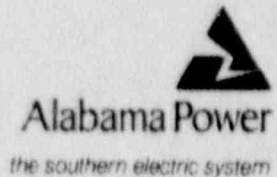


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W. G. Haireton, III
Senior Vice President
Nuclear Operations



December 7, 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
September 11 - October 10, 1989

RE: Report Number 50-348/89-22
50-364/89-22

Gentlemen:

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

"During the Nuclear Regulatory Commission (NRC) inspection conducted on September 11 - October 10, 1989, a violation of NRC requirements was identified. The violation involved unapproved overtime hours for licensed operators. In accordance with the 'General Statement of Policy and Procedure for NRC Enforcement Actions,' 10 CFR Part 2, Appendix C (1989), 53 Fed. Reg. 40019 (October 13, 1988), the violation is cited below:

Technical Specification 6.2.2.f. requires that adequate operations shift coverage be maintained without routine heavy use of overtime; individuals are not allowed to work more than 72 hours during any seven consecutive day period; during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff; and any deviation from these requirements shall be reviewed and approved by the General Manager - Nuclear Plant, his designee (Emergency Director) or higher authority.

Contrary to the above during the Unit 2 refueling outage, which occurred between March and May 1989, there were numerous instances where operators were required to routinely work 84 hours during a seven consecutive day period. Also at least two ROs and one SRO were allowed to work during their off-days even though their off-days followed a work period of seven consecutive 12 hour days. These operators did not receive prior approval on the individual basis by the General Manager - Nuclear Plant, his designee (Emergency Director) or higher authority.

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

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Admission or Denial

The above violation occurred as described in the subject reports.

Reason for Violation

This violation was caused by personnel error.

Corrective Action Taken and Results Achieved

No immediate corrective action was required. The violation occurred during the Unit 2 refueling outage. The adverse condition no longer existed when the violation was received.

Corrective Steps to Avoid Further Violations

To ensure that personnel do not deviate from Technical Specification overtime limits without proper management approval, the following actions have been taken:

- 1) The General Manager - Nuclear Plant has retrained all managers on the intent of the overtime procedures.
- 2) Managers have retrained their supervisors, down to and including first line supervisors, on overtime procedures.

To ensure that a control mechanism exists to verify adherence to specified overtime limits, the following additional actions have been completed:

- 1) A system has been established to provide an independent check of all time sheets each pay period to check for adherence to overtime limits. Errors noted are to be reported directly to management.
- 2) A system has been established to provide a report to management each pay period listing Operations and Health Physics personnel who worked a predetermined number of overtime hours per week.

Date of Full Compliance

November 28, 1989

Comments

Alabama Power Company recognizes that extended periods of excessive overtime can lead to fatigue, a decline in morale and degraded performance. The

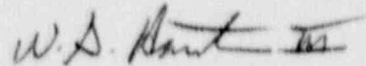
refueling outages at Farley Nuclear Plant typically last only forty to sixty days which minimizes the cumulative effects of overtime. Further, having used the present overtime schedule for refueling outages over the last ten years, Farley Nuclear Plant's subjective experience base does not suggest a tendency toward increased operator errors. Alabama Power Company will approve overtime use in accordance with Technical Specification requirements.

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,

ALABAMA POWER COMPANY



W. G. Hairston, III

WGH:emb-5.4

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