

Alabama Power Company  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201  
Telephone 205 868-5581

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



Alabama Power

*the southern electric system*

December 27, 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 50-348/89-22-01  
50-364/89-22-01

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, violations of NRC requirements were identified. This violation involved a breach of containment integrity (one violation was previously discussed in a letter to Alabama Power dated November 9, 1989). In accordance with the 'General Statement of Policy Procedure for NRC Enforcement Actions,' 10 CFR Part 2, Appendix C (1989), this violation is cited below:

- A. Technical Specification 3.9.4.C requires, during core alteration or movement of irradiated fuel within containment, that each containment building penetration providing direct access from the containment atmosphere to the outside atmosphere be either closed by an isolation valve, blind flange, or manual valve.

Contrary to the above, on October 1, 1989, Unit 1 containment integrity was breached during a core alteration involving the unlatching of the control rod drive mechanisms. The unlatching of the control rods was performed from 12:45 p.m. until about 7:48 p.m. on October 1. During that time the atmospheric relief valves for each of the steam generators were open and the secondary manway cover for steam generator 1C was open for the duration of the core alteration. The secondary manway cover for the 1B steam generator was replaced at 2:00 p.m. The open steam generator manways and the open atmospheric relief valves constitute a pathway from the containment atmosphere to the outside atmosphere during the core alterations.

This 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 in that the Shift Supervisor and Shift Foreman involved failed to follow existing procedures for valve position verification.

Corrective Action Taken and Results Achieved

1. The steam generator atmospheric relief valve was closed.
2. Management suspended all core alterations until a detailed check of all containment penetrations was performed to verify containment refueling integrity was properly established.

Corrective Steps To Avoid Further Violations

1. The Shift Supervisor and Shift Foreman involved in this event were counseled about properly verifying the status of equipment.
2. A detailed check of all containment penetrations was performed to verify containment refueling integrity was properly established.
3. All Operations crews were briefed on this event.
4. The procedure for establishing containment refueling integrity was strengthened by adding explicit signoffs for containment penetrations with verification requirements to ensure that containment refueling integrity is properly established.

Date of Full Compliance

December 5, 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*  
W. G. Hairston, III

WGH:emb-5.9

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