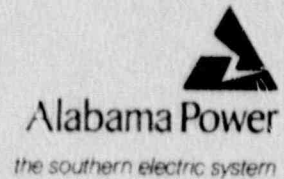


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W. G. Hairston, III  
Senior Vice President  
Nuclear Operations



June 26, 1990

Docket Nos. 50-348  
50-364

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

SUBJECT: Reply to the Notice of Violation  
J. M. Farley Nuclear Plant NRC Inspection of  
April 11 - May 10, 1990

RE: Report Numbers 50-348/90-12 and 50-364/90-12

Gentlemen:

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

"Technical Specification 6.8.1 requires that applicable written procedures recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, 1978 and Fire Protection Program implementation shall be established, implemented, and maintained. Section 9 of RG 1.33 specifies that maintenance that can affect the performance of safety-related equipment should be properly performed in accordance with procedures or drawings appropriate to the circumstances.

FSAR Section 9B.6 states that periodic inspections and tests of emergency lighting system are performed to assure that this equipment will perform satisfactorily to meet its design intent. FSAR Table 9B-7 states that emergency lighting (except containment) will be tested annually.

Contrary to the above, these requirements were not met in that:

- (a) The emergency DC lighting for the control room complex supplied from the station batteries is tested at 18 month interval in lieu of annually.
- (b) The procedures for maintaining emergency lighting, 1/2-EMP-1381.01, do not specify the 8-hour individual self-contained battery pack emergency lighting units to receive the vendor required 2-hour or 8-hour operability tests. Also the procedures do not specify that the battery cells have their levels checked on the monthly frequency, required by the vendor's manual. As a result, at least 10% of the 8-hour individual self-contained battery packs were found to have low electrolyte levels and one was found not to remain illuminated, when inspected.

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This is a Severity Level IV violation (Supplement 1)."

Admission or Denial

- (a) Alabama Power Company denies this part of the violation concerning annual testing of control room DC lighting.
- (b) Alabama Power Company admits that the testing of the self contained battery packs was not sufficient to ensure that the emergency lights would perform properly. However, Alabama Power Company does not consider the inclusion of all vendor recommendations into procedures as a requirement of RG 1.33.

Reason for Denial [Part (a)]

- (a) FSAR Section 9B.6.1 states that Table 9B-7 presents a typical list of fire surveillance procedures. Item 40.0 of this table is "Emergency lighting (except containment) -- annually." This item was included in the table to demonstrate that battery pack emergency lights are tested in conjunction with Appendix R. This testing is performed at FNP by procedures FNP-1/2-EMP-1381.01.

The control room emergency lights are not battery pack lights, rather they are powered from the 125 volt vital D.C. buses. The emergency lighting for the control room is described in section 9.5.3.3 of the FSAR. No testing requirements are delineated in the FSAR for the control room emergency lights, however, testing of these lights is performed by FNP-1-STP-150.10. This test has been performed at least every 18 months and has been demonstrated, since 1982, to have been sufficient to confirm the adequacy of this surveillance interval.

Reason for Violation [Part (b)]

- (b) Personnel error - The frequency and scope of the testing was not adequate.

Corrective Action Taken and Results Achieved

- (a) Not applicable.
- (b) The electrolyte level has been raised in those lights identified by the inspector to have low electrolyte level. The inoperable light identified by the inspector has been repaired. Other Appendix R emergency light battery packs will be inspected for proper electrolyte level by August 31, 1990.

Corrective Steps To Avoid Further Violations

- (a) Not applicable.
- (b) The preventive maintenance program for Appendix R emergency lights will

U. S. Nuclear Regulatory Commission  
June 26, 1990  
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be evaluated to ensure the frequency and scope of the testing performed is adequate to maintain the emergency lights in an operable condition.

Date of Full Compliance

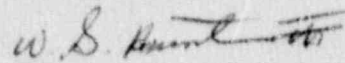
August 31, 1990

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-5.17

cc: Mr. S. D. Ebnetter  
Mr. S. T. Hoffman  
Mr. G. F. Maxwell