

NOTICE OF VIOLATION

Southern Nuclear Operating Co.
Farley Nuclear Plant

Docket Nos. 50-348 and 50-364
License Nos. NPF-2 and NPF-8

During an NRC inspection conducted on August 12-16 and 26-30, 1996, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Operations Quality Assurance Policy Manual, Section (§) 5.1 Instruction, Procedures and Drawings, states that Southern Nuclear Company - Farley Project will perform safety related activities in accordance with properly approved instructions, procedures and drawings and that contractor and vendor organizations will perform safety-related activities in accordance with properly approved instructions, procedures, and drawings.

Contrary to the above, as of August 10, 1996, properly approved configural control procedures and drawings were not followed in that the "as built" sample line for the Unit 1 Post Accident Sampling System containment airborne particulate detector was not constructed in accordance with Production Change Notice (PCN) No. B-79-553. Specifically, 90 degree elbows were installed in the filter inlet line.

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

- B. 10 CFR 50.54(h) requires, in part, the license to be subject to the provisions of the Act now or hereafter in effect, and to all rules, regulations and orders of the Commission.

By letter dated March 14, 1983, an Order to implement and maintain license commitments for post-TMI related items was issued. The Order referenced commitments documented in letters dated April 16, 1982, and June 4, 1982, issued in response to NRC Generic Letters 82-05 and 82-10, and specified, in part, that Three Mile Island (TMI) Action Item II.F.1-3 was complete.

NUREG 0737, Clarification of TMI Action Plan Requirements, Table II.F.1-3 Containment High Range Monitor, specifies, in part, a monitor range of 1 Roentgen per hour (R/hr) to 10^7 R/hr, and that *in situ* calibration by electronic signal substitution is acceptable for all range decades above 10 R/hr.

Enclosure 1

Contrary to the above, as of August 12, 1996, the licensee failed to implement and maintain the March 14, 1983 Order, in that, *in situ* special calibration by electronic signal substitution for all range decades above 10 R/hr were not conducted for the installed containment high range monitors.

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

- C. 10 CFR 20.1904(a) requires, in part, that each container of licensed material bears a durable, clearly visible label bearing the radiation symbol and the words "CAUTION, RADIOACTIVE MATERIAL" or "DANGER, RADIOACTIVE MATERIAL." The label must provide sufficient information (such as nuclides present, estimates of quantities of radioactivities, radiation levels, kinds of materials) to permit individuals handling or using the containers, or working in the vicinity of the containers, to take precautions to avoid or minimize exposure.

Contrary to the above, as of August 26, 1996, the licensee failed to label properly, two SurPac Casks located outside of the Radiologically Controlled Area and which contained resins having radionuclide materials exceeding the quantities listed in Appendix C to 10 CFR §§ 20.1001-20.2401. The labels did not provide radiation levels or estimate activities, did not indicate time and dates for radiological surveys conducted, and did not identify the kinds of materials present. Similar labels were affixed to empty SurPac Casks within the same general area.

This is a Severity Level IV violation (Supplement IV)

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

Procedure FNP-O-M-001, Health Physics Manual, Rev. 12, effective July 14, 1996, § 5.4 requires dosimetry devices to be worn on the front of the body between the neck and waist inclusive. The Thermoluminescent Dosimeter (TLD) and Digital Alarming Dosimeter (DAD) should be worn near each other on the body.

Contrary to the above, during the week of August 26, 1996, numerous individuals within Radiologically Controlled Areas of the Unit 1 and Unit 2 Auxiliary Buildings and the Low Level Radioactive Waste building were observed with personal dosimetry not being worn on the front of the body between the neck and waist, and with the TLD and DAD separated from each other.

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

- E. TS 6.8.1(i) requires, in part, that written procedures be established, implemented and maintained covering programs for effluent and environmental monitoring, using the guidance in Regulatory Guide (RG) 4.15, February 1979.

RG 4.15 specifies, in part, that procedures for storage of samples be designed to maintain the integrity of the sample from time of collection to time of analysis.

Contrary to the above, as of August 12, 1996, the licensee failed to have an adequate procedure to maintain iron-55 (Fe-55), strontium (Sr)-89, and Sr-90 concentrations in solution for composite samples collected and stored to assure representative liquid effluent stream measurements.

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

Pursuant to the provisions of 10 CFR 2.201, Southern Nuclear Operating Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previously docketed correspondence if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for

withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Atlanta, Georgia
this 27 day of September 1996