

NOTICE OF DEVIATION

Southern Nuclear Operating Company
Farley Nuclear Plant, Units 1 and 2

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

During a NRC inspection conducted on July 21 through August 31, 1996, several deviations were identified from commitments you made as part of a Technical Specifications (TS) amendment request. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the deviations are listed below:

By letter dated August 17, 1994, as supplemented by letters dated June 15 and August 11, 1995, the Southern Nuclear Operating Company (SNC) made a number of commitments in their request to eliminate TS surveillance requirements for periodic response time testing (RTT) of pressure and differential pressure sensors in the Reactor Trip System (RTS) and Engineered Safety Feature Actuation System (ESFAS). These commitments were affirmed in the NRC safety evaluation report (SER) dated September 28, 1995, and provided a significant part of the basis by which SNC's TS amendment was approved. They were also incorporated into the TS Bases.

As restated in the NRC SER, SNC committed to accomplish the following:

- (1) Revise applicable plant surveillance test procedures to stipulate that allocations for pressure sensor response times must be verified by performance of an appropriate RTT prior to placing a sensor in operational service and re-verified following maintenance that may adversely affect sensor response time, such as replacing the sensing assembly;
- (2) Revise plant procedures and other appropriate administrative controls to stipulate that pressure sensors utilizing capillary tubes, e.g., containment pressure, must be subjected to RTT after initial installation and following any maintenance or modification activity which could damage the capillary tubes;
- (3) Utilize allocated sensor response times in accordance with the methodology contained in Section 9.0 of WCAP-13632, Revision 2, to verify total RTS and ESFAS channel response time.

Contrary to the above, SNC failed to properly fulfill its commitments when implementing the TS amendment changes approved on September 28, 1995, by the NRC in Facility Operating License amendment numbers 116 for Unit 1 and 108 for Unit 2. Item (1) was only partially addressed by surveillance test procedure changes for Unit 1, and not at all for Unit 2. Item (2) was overlooked on both units. And, item (3) was addressed by surveillance test procedure changes for Unit 1 but not for Unit 2.

Enclosure 2

Notice of Deviation

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Please provide to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 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, in writing within 30 days of the date of this Notice, (1) the reason for the deviation, or, if contested, the basis for disputing the deviation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further deviations, and (4) the date when your corrective action will be completed. Where good cause is shown, consideration will be given to extending the response time.

Dated at Atlanta, Georgia.
this 27th day of September 1996

Enclosure 2