

Docket Nos. 50-348
and 50-364

February 17, 1984

Mr. F. L. Clayton
Senior Vice President
Alabama Power Company
Post Office Box 2641
Birmingham, Alabama 35291

Dear Mr. Clayton:

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NRC PDR
L PDR
ORB#1 Rdg
DEisenhut
OELD
EJordan
JTaylor
ERees (2)
CParrish
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By letter dated January 13, 1983, you requested an exemption to 10 CFR 20 relating to "Protection Factors for Respirators", footnote (c) of Appendix A. If granted, the exemption would allow credit for a radioiodine protection factor while employing the MSA 466220 GMR-1 Canister.

The NRC staff review of your request continues. However, we had requested additional information shown in the enclosure to our letter dated February 8, 1984 documenting the draft questions which were transmitted to your staff on January 30 and February 1, 1984. Our February 8 letter formally documented the NRC staff concerns. You responded by letter dated February 10, 1983.

Further discussions were held between the NRC staff and your staff during telecons of February 14 and 16, 1983, in an attempt to understand your staff response. This letter formally documents the NRC staff questions resulting from these teleconferences. Please reply at your earliest convenience to allow continuing our review which you requested to support the refueling outage on Joseph M. Farley Nuclear Plant, Unit No. 1.

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents; therefore OMB clearance is not required under P.L.

~~ORIGINAL SIGNED~~

Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

Enclosure:
As stated

cc: w/enclosure
See next page

ER *DCV*
ORB#1:DL C-ORB#1:DL
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

February 17, 1984

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and 50-364

Mr. F. L. Clayton
Senior Vice President
Alabama Power Company
Post Office Box 2641
Birmingham, Alabama 35291

Dear Mr. Clayton:

By letter dated January 13, 1983, you requested an exemption to 10 CFR 20 relating to "Protection Factors for Respirators", footnote (c) of Appendix A. If granted, the exemption would allow credit for a radioiodine protection factor while employing the MSA 466220 GMR-1 Canister.

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Ronald C. Fischer for
Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

Enclosure:
As stated

cc: w/enclosure
See next page

Mr. F. L. Clayton
Alabama Power Company

Joseph M. Farley Nuclear Plant
Units 1 and 2

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State Department of Public Health
ATTN: State Health Officer
State Office Building
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Regional Radiation Representative
EPA Region IV
345 Courtland Street, N.E.
Atlanta, GA 30308

471.0 RADIOLOGICAL ASSESSMENT BRANCH _ REQUEST FOR ADDITIONAL INFORMATION

- 471.11 Provide additional details for the limitations for use for the GMR-I canisters as follows:
- a. What specific organic vapors are of concern at the Farley 1 & 2 facilities in both storage and proposed useage areas (e.g. freons, alcohols, carbon tetrachloride, paint fumes, EDTA, etc)? How will levels of concern be established for such vapors?
 - b. How will such vapors be precluded and/or detected in storage and/or work areas so as to prevent aging and impacts on service life/capacity?
 - c. How will environmental temperature and humidity be initially determined and then subsequentially measured and controlled throughout the course of work, particularly during changing conditions?
- 471.12 Provide a commitment to verify the effectiveness of this special respiratory protection program, including the following:
- a. weekly whole body counts for individuals using the GMR-I canister for radioiodine protection;
 - b. for individuals who exceed 10 MPC hours, a whole body count will be required prior to the individual's next entry into a radioiodine atmosphere;
 - c. establish an uptake level beyond which further entry into a radioiodine atmosphere would be restricted, pending health physics evaluation (e.g. 70 nCi);
 - d. establish a whole body count/survey data base to be used to evaluate the results of the program, identify additional necessary restrictions, or provide recommendations for reduced requirements.
- 471.13 Provide specific information for selected tasks which compares data on dose rate, manpower, task time, and total dose for the use of GMR-I canisters and air line respirators (as previously requested in Q471.2).
- 471.14 Perform batch QC tests under cyclic flow test conditions (e.g. 56 L/m) or provide sufficient test data under testing conditions of worst case temperature and relative humidity to show the absence of a cyclic flow effect, i.e. service life under cyclic flow test conditions is not significantly less (95% confidence) than service life under steady state conditions. (Reference Q471.5)
- 471.15 (a) Perform quality control testing under the conditions of worst case temperature at worst case relative humidity, or worst case temperature at two lower relative humidities with extrapolation to worst case relative humidity, when computing servicelife per QC test conditions listed in (b) below. (Reference Q471.6, 471.8)

471.15 (b) Provide a commitment to establish a 1% AQL for test conditions of 25 ppm challenge concentration of CH_3I ; worst case relative humidity (or via extrapolation); 30°C ; 56 L/m cyclic flow (or 64 L/m steady state flow), (as established in Q471.14), for a service life of 8 hours or more at .25 ppm penetration. (Reference Q471.8)