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Alabama Power

the southern electric system

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- Misc. Notice Nureg. 0610
(44 FR 55746)

December 7, 1979

Docket Nos. 50-348
50-364

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Docketing & Service Branch

Gentlemen:

Re: Farley Nuclear Plant
Comments on NUREG-0610

Attached are additional comments on NUREG-0610,
dated September, 1979.

Yours very truly,

H. O. Thrash
Manager
Nuclear Generation

HOT/TNE/rmb
Attachment

cc: Mr. R. A. Thomas
Mr. G. F. Trowbridge



Acknowledged by card, clh, 12/28

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The following is a summary of comments that resulted from the review of NUREG-0610; Draft Emergency Action Level Guidelines; September 1979.

Class: Notification of unusual event

1. Licensee Action #1 requires prompt notification of state and local off-site authorities of the nature of unusual conditions as soon as they are discovered.

It is believed that in all classes of emergencies, it is more appropriate to notify only the state authorities, except Class A General Emergencies, for which local authorities would be notified directly if the state authorities could not be reached. This notification order would then allow the state to notify the local authorities at their discretion and thus more effectively implement the state emergency plans.

2. Initiating condition #1, ECCS initiated, would be a more acceptable example if it were; ECCS initiated as a result of an ECCS setpoint being reached. This would eliminate the need for notification of state authorities in the event of an inadvertant ECCS actuation.
3. Initiating condition #3c, Fuel damage indication by failed fuel monitor (PWR) indicates an increase greater than 0.1% equivalent failed fuel within 30 minutes, requires that fuel failure be measured as a rate of fuel failure. We are set up to measure only total failed fuel.
4. Initiating condition #6, Failure of a safety or relief valve to close, is too broad of a scope for notification of state authorities, due to the large number of such valves. A condition that the PZR or main steamline safety or relief valves did not close would be a better requirement.
5. Initiating condition #10, Fire lasting more than 10 minutes, is too broad in scope for a notification requirement. Most fires will last 10 minutes due to response times of the fire brigade and time required to verify that the fire is out. A more appropriate requirement would be any fire requiring off-site assistance or change in plant operating status.
6. Initiating condition #14e, Other hazards being experienced or projected, i.e. Turbine Failure, unnecessarily requires notifying the state of an event that would have no effect on the health and safety of the general public. The only turbine failure that would be of any significance would be a 100% load rejection with substantial primary to secondary leakage, thus possibly releasing radioactive effluent through the Main Steamlines Relief and Safety Valves.
7. Initiating conditions #13, Natural phenomenon being experienced or projected beyond usual levels, and #15, other plant conditions exist that warrant increased awareness on the part of state and/or local off-site authorities..., would both more appropriately be classified as Alert conditions.

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8. Initiating condition #17, Rapid depressurization of PWR secondary side, is an event that would lead to an ECCS actuation, which is covered by initiating condition #1, therefore should be deleted.
9. Initiating conditions #4, Abnormal coolant temperature and/or pressure or abnormal fuel temperature, #5, Exceeding either primary/secondary leak rate Tech Specs or primary system leak rate Tech Spec, #7, Loss of off-site power or loss of on site AC power capability, #8, Loss of Containment integrity requiring shutdown by Tech Specs., #9, Loss of ESF or fire protection system functions requiring shutdown by Tech Specs, and #11, Indications or alarms on process or effluent parameters not functional in control room to an extent requiring plant shutdown or other significant loss of assessment or communication capabilities, are all items reportable to the NRC as a LER. Each of these reportable items are 30 day reporting time frame, therefore prompt notification to the state of these events is more restrictive than reporting to the Commission and also doubles the reporting requirement.

Significant items could best be reported by notification of the state under one general condition, i.e. promptly notify the state authorities whenever the reactor is in an uncontrolled or unexpected condition.

Class: Alert

1. Licensee action #7, Close out by verbal summary to off-site authorities followed by a written summary within 8 hours, does not provide adequate time to provide a concise summary report. This is also the same requirement for the Site and General classifications. To provide an adequate and concise summary report, a minimum of 24 hours would be needed. It should also be noted that the more serious the emergency the more time that would be needed to summarize.
2. Initiating condition #1c, Severe loss of fuel cladding, i.e. failed fuel monitor (PWR) indicates increase greater than 1% fuel failures within 30 minutes or 5% total fuel failures, requires a rate of change measurement of fuel failure for the 1% in 30 minutes. Presently the failed fuel detection system monitors only failure total.

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