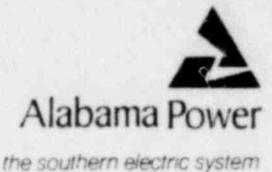


Alabama Power Company
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F. L. CLAYTON, JR.
Senior Vice President



April 7, 1980

Docket Nos. 50-348
50-364

Director
Office of Nuclear Reactor Regulations
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Mr. A. Schwencer

Re: F. L. Clayton's Letter to
Director of NRR, Dated
October 10, 1979

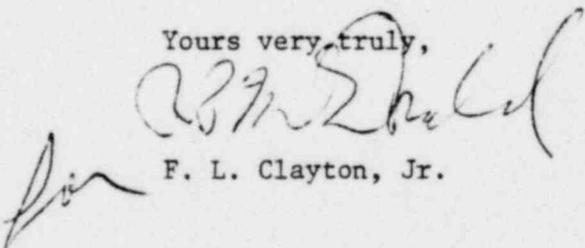
Dear Mr. Schwencer:

Alabama Power Company submits the attached supplement to the proposed Technical Specification Amendment to the Joseph M. Farley Nuclear Plant Unit No. 1, incorporating Radiological Effluent Technical Specifications into Appendix A and the proposed draft, Radiological Effluent Technical Specifications for Unit No. 2, submitted in the referenced letter.

It is hereby requested that a meeting be held, at your earliest convenience, between NRC management and Alabama Power Company management to obtain final resolution to items of disagreement between my staff and the NRC staff if any disagreement exists after you review.

If you have any questions, please advise.

Yours very truly,


F. L. Clayton, Jr.

FLCJr/TNE:aw

Attachment

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

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BASES FOR CHANGES TO DRAFT JOSEPH M. FARLEY NUCLEAR PLANT
RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS (RETS)

1. Addition of words "definition of" clarifies that specific numerical data is not to be included in the ODCM.
2. With the discharge valves closed no release can occur. Locking of the discharge valves prevents inadvertent opening. Since this ensures compliance with the ACTION statement, the specification and surveillance should not be applicable when the discharge valves are locked closed.
3. Operation of the plant in a degraded mode (less than minimum channels operable) permitted by the Tech Specs is reportable by LER per specification 6.9.1.13b. In the case of the effluent monitoring instrumentation, there will be no adverse impact on public health and safety by operating in a degraded mode provided the requirements of the ACTION statement are met. The proposed special report will serve to notify NRC of the operation under this condition. The 14-day delay in the report will avoid the promulgation of excessive numbers of reports whenever an instrument fails.
4. The insertion of specific instrument numbers into the specification serves no function. Deletion of the numbers restores the plant's ability to modify plant systems under 10CFR50.59.
5. The 14-day limit is unreasonably short for obtaining replacement parts for repair of an instrument. As the part most likely to fail is the scintillation detector, maintaining a spare instrument is not feasible because the detector's shelf life is limited.
6. The normal sample analysis is fully automated from the start of counting to the computer printout of final results, hence, verification of calculations is unnecessary. If, however, the calculations must be performed manually due to a computer failure, this should be permitted. Also, please note that only those input parameters that are loaded into the computer by the operator are subject to verification. The sample count data are automatically loaded and cannot be independently verified.
7. The sentence was deleted because it is ambiguous. No known source will permit calibration over such a set of conditions. Please note that this instrument serves only an alarm function and as such should not be subjected to quantitative calibration criteria.
8. The word "or" is inserted to denote equipment which serves a redundant function.
9. Action 35 was added to cover the batch release of gaseous wastes.

10. Normal building ventilation is required to continue at all times. If the ventilation system is secured, excessive airborne activity within the occupied spaces, including non radiation-controlled areas of the plant, could result. Airborne radioactivity which builds up in buildings will escape via doors and the resultant ground-level release could actually increase exposure to the public. The continued operation of building ventilation will protect the safety of the workers and will not result in increased exposure to the public.
11. At FNP the undesirable condition is high O_2 at the recombiner outlet. Either combination of instruments (a or b) will assure that the 60 ppm O_2 limit at the recombiner outlet is not exceeded. Isolation of the O_2 supply will assure that no O_2 is added to the system. NRC staff agreed with this position during our meeting of June 6, 1979.
12. The use of auxiliary sampling equipment will provide results that equal those of the normal equipment.
13. These instruments do not have trip functions.
14. The calibration gases presently used are those recommended by the instrument manufacturer. The manufacturer is the most qualified to determine the calibration requirements for his instruments.
15. The effluent releases are not directly related to the mode of plant operation. Under certain conditions the effluents could be increased by forcing the plant to shut down. As the reporting requirements of 6.9.1.13.b are in effect, any decision to remain at power would be explained in the written report. In the event the release cannot be secured, specs should have flexibility to allow the plant operation personnel to take whatever action would minimize exposure to the public. Unit shutdown under 3.0.3 (within one hour) could detract from human resources available on site at the time of the incident which would be better spent securing the release.
16. Table 4.11-1 specifies when analyses are to be performed. As not all analyses are performed prior to release, this change is necessary for consistency.
17. If the liquid is not released to the environment, no analysis is justified.
18. The daily grab sample will provide adequate assurance that releases in excess of desirable limits do not occur.
19. This added note will prevent excessive reporting of MDC variations caused by the presence of isotopes which may interfere with the detection of the isotopes of primary interest. This possibility is acknowledged in Table 2-1 of the present FNP Technical Specifications, Appendix B. The excessive reporting of MDC violations would divert personnel resources from other activities and could actually detract from plant safe operations.

20. Editorial change only.
21. The added wording is to clarify what constitutes the existing FNP systems. The change in time period from 31 days to quarters and corresponding dose values (increased by a factor of three) allows continued use of existing plant computer software. This change was discussed and agreed to in previous meetings with the NRC staff. As written, the specification will require that a set of equipment be operable for use as required. It will not require that all radwaste equipment be available at all times. This facilitates radwaste maintenance. Note that the radwaste maintenance is best performed with the reactor at power as the waste volumes produced tend to increase in outages.
22. The liners will contain liquids at certain stages of the solidification process and must be excluded from the curie limit during that process.
23. One hour is an unreasonably short time. NRC previously had 48 hours for this action.
24. This modification will eliminate needless radiation exposures in taking measurements of tanks with low inventories. As the addition of over 30,000 curies to a tank in one month is extremely unlikely, the monthly surveillance of the tanks below 50,000 curies will assure that 70,500 curie limit is not exceeded. Table 11.3-7 of the FNP FSAR indicates an equilibrium activity of 24,000 curies in the tanks. The addition of more than 1.25 times the equilibrium value in a single month is extremely unlikely.
25. This specification does not cover all solid radwaste, only the solidification of liquid-bearing wastes.
26. The revised listing reflects the waste streams at FNP.
27. This reporting requirement is more specific and easier to comply with than that of NRC's draft.
28. Provision of requested information.
29. The ODCM does not include information on the interlaboratory comparison program.
30. No fresh drinking water systems are downstream of FNP.
31. During many reactor startups, one or more reactor trips occur due to manual control of steam generator level and required manual blocking of reactor trips. During low power physics testing, multiple reactor startups are performed as part of the physics test program. Either of these conditions results in excessive sampling requirements over a very short time interval. The revised wording clarifies that a "startup" is considered to be bringing the reactor to greater than 15% power and a "shutdown" is considered to be from greater than 15% power. Such clarification will correct the excessive sampling requirement.

32. H-3 and Principal Gamma Emitters in the SJAE exhaust are related to primary plant operation only and not to the refueling canal.
33. Technical Specification 3.4.8 requires sampling and analysis of the RCS iodine concentration one per 14 days and following any reactor power level change of greater than 15% during one hour. This requirement ensures RCS activity is monitored. Since there can be no significant change in the gaseous release pathway concentration unless there is either a significant change in the source (RCS) concentration or a significant change in release rate from a major source (i.e., RCS with $>0.1 \mu\text{Ci/ml}$), the revised wording provides assurance that effluents will be monitored when the potential for change is present but does not require unnecessary sampling when the potential for change is insignificant.
34. Review of changes to radwaste treatment systems is already covered by Specification 6.5.1.6.b and c.
35. Note that separate change submittals have been made affecting sections 6.5.1.2, 6.5.2.2, 6.5.3.1.a and 6.12.
36. Alabama Power Company has not committed to Regulator Guide 4.15. Item 6.5.2.8.0 was not included in the previous SETS drafts reviewed by APCo. Item 6.8.1.1 was worded as revision in previous drafts reviewed by APCo.
37. Specifying radiological environmental surveillance results from each unit in the Annual Radiological Operating Report is not possible since surveillance results are for total site releases.
38. Radiation workers are by definition not members of the public when engaged in activities associated with the fuel cycle. Evaluation of exposure to non-radiation workers inside the site boundary is not practical due to no measurable exposure being received in non-radiation control areas.
39. 40CFR190 requirements are met by specification 3.11.4 and its reporting requirements. An annual 40CFR190 report is not required.
40. This requirement is already covered by 6.9.1.13.e.
41. This is a duplication of 10CFR50.59 reporting already in effect.
42. Specification 6.5.3.1 specifies procedure and document review and approval requirements and authorities.