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F. L. CLAYTON, JR.
Senior Vice President



June 17, 1980

Docket No. 50-364

Director, Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. A. Schwencer

Gentlemen:

Joseph M. Farley Nuclear Plant Unit 2
Training During Low Power Testing

Enclosed is additional information requested by the NRC staff concerning Alabama Power Company's review of the special low power testing program for Farley Unit 2.

If you have questions, please advise.

Yours very truly,


F. L. Clayton, Jr.

RLG:de

Enclosure

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

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ENCLOSURE

In response to Commissioner Action, dated May 2, 1980, entitled "TMI-2 Action Plant," Section I.G.1, "Training During Low Power Testing," Alabama Power Company has reviewed the special low power testing requirements of NRC for Joseph M. Farley Nuclear Plant - Unit 2. Following are the tests which have been considered in this review.

<u>Test No.</u>	<u>Description</u>
1	Natural Circulation Demonstration
2	Natural Circulation with Simulated Loss of Offsite Power
3	Natural Circulation with Loss of Pressurizer Heaters
4	Effect of Steam Generator Secondary Side Isolation on Natural Circulation
5	Natural Circulation at Reduced Pressure
6	Cooldown Capability of the CVCS
7	Simulated Loss of All Offsite and Onsite AC Power
8	Establishment of Natural Circulation from Stagnant Conditions
9a	Forced Circulation Cooldown
9b	Boron Mixing and Cooldown with Natural Circulation

During our review we have given special attention to potential benefits that may be realized from repeating these tests which are already being or will be performed by Sequoyah Unit 1, North Anna Unit 2, and Salem Unit 2. Our review included the associated potential risks, especially when the plant safety systems are deliberately placed in degraded conditions in order to perform some of these tests. The following are our conclusions.

As far as the technical information needs expressed by NRC are concerned, the data that will be obtained from the tests to be performed by the above three NTOL plants should adequately satisfy this need. All the test results from these plants will be available and we, therefore, see little benefit to be derived from repeating these tests for Farley Unit 2. Even though the difficulty in performing these tests remains the same from plant to plant, the data should not be plant specific. Therefore, we believe Farley Unit 2 should not be required to conduct these tests solely for the purpose of obtaining more technical data.

However, for the purpose of achieving better operator training we propose the following:

- a) Perform test Number (1) at the Farley Nuclear Plant prior to full power license of Unit 2. All Unit 2 operators will observe or participate during the test.
- b) Perform modified test Number (7) on Unit 2 using reactor coolant pump heat instead of nuclear heat (same as Salem Unit 2). All Unit 2 operators will participate in or observe the test.
- c) For the remaining tests, we believe that the training of operators can be better accomplished by use of simulator training, class room training, or simulator observation, or a combination thereof. Alabama Power Company will commit to providing such training for all Farley Unit 2 operators within one year after the issuance of full power operating license.