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Docket No. 50-364

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

Attention: Mr. A. Schwencer

JOSEPH M. FARLEY NUCLEAR PLANT - UNIT 2
TECHNICAL SPECIFICATIONS

Gentlemen:

As a result of meetings with the NRC Staff on August 21-28, 1980, regarding the Appendix "A" Technical Specifications, the Staff stated that Alabama Power Company should formally docket our requests regarding Specifications 3.3.3.8 "Accident Monitoring Instrumentation" and 3.7.9 "Snubbers". A discussion of these requests are provided below.

Included in Specification 3.7.9 are ACTION statements and SURVEILLANCE REQUIREMENTS associated with mechanical type snubbers. Field testing equipment necessary to comply with the SURVEILLANCE REQUIREMENTS for mechanical snubbers are not currently available but are under development. In light of the above, Alabama Power Company requests an exemption from the mechanical snubber surveillance requirements until startup following the first refueling outage. The list of mechanical snubbers that should be included in the Technical Specifications will be provided at that time.

The existing ACTION statement for inoperable accident monitoring instrumentation (Technical Specification 3.3.3.8) requires that:

(1) With the number of OPERABLE channels less than the required channels shown in Table 3.3-11 (Attachment 2), the inoperable channel must be restored to OPERABLE status within seven days or be in HOT SHUTDOWN within the next 12 hours.

(2) With the number of OPERABLE channels less than the minimum channels shown in Table 3.3-11, the inoperable channels must be restored to OPERABLE status within 48 hours or be in at least HOT SHUTDOWN within the next 12 hours.

Nine of the thirteen accident monitoring instruments identified in Technical Specification 3.3.3.8 Table 3.3-11 for post accident monitoring have sensors which are located inside containment. Most of the electronic portion of the systems are located outside containment and are accessible for repair during power operation. The operator has backup main control board instrumentation (Attachment 1) that would be utilized for monitoring. This backup instrumentation would provide equivalent information to the operator during the period of accident monitoring instrumentation inoperability.

The limiting case to return an inoperable channel to operable status would be to replace a transmitter with a sealed reference leg located inside containment. To replace a transmitter, the isolation valves (located inside containment) separating the transmitter from the process system must be closed. If these valves do not leak, the replacement can be completed in MODE 3 or 4. If any valve leakage exist, plant cooldown to MODE 5 is required to replace the transmitter. The transmitter must be cut out, a valve installed to draw a vacuum, a vacuum drawn on the reference leg for 24 hours, the replacement transmitter installed (a qualified welder is required for welding), the reference leg filled and sealed, and the new transmitter calibrated. A transmitter replacement time of 3 to 4 days is required after the plant is in the required conditions. In addition to the repair time about seven days is required to shutdown, cooldown the primary system, adjust primary chemistry within limits and perform the necessary surveillance testing for startup. Due to the availability of a remaining channel and backup instrumentation, and the possible time required to replace a transmitter, a 31 day ACTION statement is necessary to lessen the impact of plant shutdown on the system load.

If one less than the minimum channels is available for accident monitoring, backup instrumentation (Attachment 1) would be utilized by the operator for monitoring. To return the inoperable channel to service may require a plant shutdown to repair. Two days to return the inoperable channel to service would be sufficient if the transmitter isolation valves did not leak or if the problem was electronic in nature. Seven days would be required to schedule the 48 hour shutdown during the weekend minimum load period.

Alabama Power Company request an ACTION statement requiring 31 days to restore an inoperable channel to OPERABLE status when less than the required accident monitoring channels are OPERABLE. If less than the minimum accident monitoring channels are operable, an ACTION statement requiring seven days to restore the inoperable channels to OPERABLE status is requested. Attachment 2 is a proposed technical specification for Accident Monitoring Instrumentation.

In conclusion, Alabama Power Company requests the NRC Staff consider the above in development of the final "Appendix A" Technical Specifications for Farley Unit 2.

Very truly yours,

for F. L. Clayton, Jr.

BDM/rt

Attachments

cc: Mr. R. A. Thomas
Mr. G. F. Trowbridge
Mr. L. L. Kintner
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Mr. D. Vito

bc: Mr. R. P. McDonald
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ATTACHMENT 1

| | Accident Monitoring Instrument | Backup Instruments |
|---|---|---|
| * 1. | RCS Temperature $T_{hot}$ - Wide Range | Pressurizer temp & pressure; incore thermocouples; narrow range temperature indication at power. |
| * 2. | RCS Temperature $T_{cold}$ - Wide Range | Incore thermocouples; narrow range temperature indication at power. |
| * 3. | RCS Wide Range Pressure | Pressurizer pressure |
| * 4. | Steam Generator Level Wide Range/Narrow Range | AFW flow; three narrow range and one wide range channel. |
| 5. | Refueling Water Storage Tank (RWST) level | RWST level switches that provide MCB alarms; local indication. |
| * 6. | Containment Pressure | Four channels narrow range; two channels wide range; phase A, phase B trip status lights. |
| * 7. | Pressurizer Level | Three channels; containment sump level; PRT Level; VCT Level; high energy line break indication. |
| 8. | Steam line pressure | Feedline pressure; steam flow; local indication; protection grade transmitters; non-safety grade transmitters for control systems. |
| 9. | Auxiliary Feedwater (AFW) Flow | Steam generator level; AFW motor current; AFW suction flow |
| * 10. | RCS Subcooling Monitor | RCS wide range $T_{hot}$, $T_{cold}$, RCS wide range pressure; (manual method to determine sub-cooling). |
| * 11. | PORV Position Indication | PRT Level, temperature, pressure; PORV relief line temperature. |
| * 12. | PORV Block Valve Position Indication | PRT Level, temperature, pressure; PORV block valve relief line temperature. |
| * 13. | Safety Valve Position Indication | PRT Level, temperature pressure; safety relief line temperature indication. |

* Sensors located in containment and require shutdown to replace this portion of the system.