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F. L. CLAYTON, JR.
Senior Vice President



February 23, 1981

Docket No. 50-348
No. 50-364

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

Attention: → Mr. S. A. Varga
Mr. A. T. Schwencer

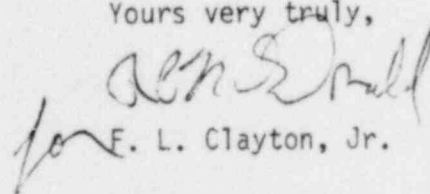
Gentlemen:

JOSEPH M. FARLEY NUCLEAR PLANT - UNITS 1 & 2
CLARIFICATION OF TMI ACTION PLAN REQUIREMENTS
(NUREG-0737)

Enclosed, as requested by the NRC staff in a telephone conversation February 20, 1981, is additional information concerning several NUREG-0737 items. These positions have been discussed with the NRC and are considered by Alabama Power Company to satisfy the staff's questions.

If you have any further questions, please advise.

Yours very truly,


F. L. Clayton, Jr.

FLCjr/RWS:de

Enclosures

cc: Mr. A. Thomas
Mr. G. F. Trowbridge
Mr. E. A. Reeves (w/enclosures)
Mr. L. L. Kintner (w/enclosures)
Mr. W. H. Bradford (w/enclosures)

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I.A.1.3 Shift Manning

Previous Response

In letters dated June 26, 1980 for Unit 1; and June 20, 1980, August 7, August 14, 1980 and September 8, 1980 for Unit 2, Alabama Power Company submitted commitments and documentation of actions taken at the Farley Nuclear Plant.

Clarification Response

Alabama Power Company presently has as its policy the establishment of normal work schedules which do not include the use of overtime. In addition, the Company has as its objective the limitation of overtime to the extent practical.

The Company will incorporate into plant administrative procedures this policy concerning the utilization of overtime. This procedure, which will establish work schedules and guidelines that control the use of overtime for the plant staff who perform safety related functions, will be approved by corporate management. This work schedule guidelines will comply with NUREG-0737 clarification.

For personnel required by Farley Nuclear Plant Technical Specifications, Sections 6.2.2(a) and (c), the plant manager or in his absence, the plant emergency director will approve any deviations from the overtime guidelines described in the plant administrative procedures.

For all other personnel performing safety related functions, the group supervisor or superintendent will approve any posted work schedule deviating from the overtime guidelines described in plant administrative procedures. In those unexpected situations where the necessity exists, due to unforeseen shift-to-shift contingencies or emergencies to work personnel more than 12 hours straight, or to not provide such personnel with a break between work periods of at least 12 hours in order to perform safety related work, the respective group foreman may authorize such deviation. Action on the foreman's part in these situations will be reviewed by the respective group supervisor or superintendent as a part of the normal biweekly approval process for payroll time records. It is the opinion of Alabama Power Company that this commitment meets the spirit of the management control process of limiting overtime in that it provides a two-tier approval and review for the unexpected situation described above.

This commitment will be implemented prior to fuel loading in Unit 2. On this date the above restrictions will apply to appropriate personnel on both units.

I.C.6 GUIDANCE ON PROCEDURES FOR VERIFYING CORRECT PERFORMANCE OF OPERATING ACTIVITIES

Previous Response

This item was formally issued as a part of NUREG 0737, therefore, there has been no previous response.

Clarification Response

Since the Farley Nuclear Plant was placed in service, Alabama Power Company as a matter of good operating practice, has had policies and procedures to insure that the operational status of power plant equipment was controlled by shift supervision, plant operators were informed of the equipment's status, and that positive means were employed to insure equipment would perform its intended function when being returned to service.

Shortly after the accident at TMI-2, Alabama Power Company strengthened its policies and procedures to require an independent verification be performed when returning to service equipment important to safety.¹ This policy also included independent verification following refueling or major maintenance outages. Specifically, these current procedures include the following:

Authority to release equipment important to safety for maintenance or surveillance testing or return to service is delegated to the on-shift SRO with the stipulation that the shift supervisor be kept fully informed of each status.

Plant operators (control room work location) are required to log the removal and return to service of equipment important to safety.

Upon return to service of equipment important to safety, a formal verification of the lineup is conducted. The lineup and the verification are performed by individuals qualified on the equipment or system. The lineup and verification includes valves, switches, and breakers as appropriate.

At this time, Alabama Power Company does not feel that independent verification when removing equipment important to safety from service is justified in all cases. In most cases, the removal of equipment from service is verified from the control room as part of routine shift operation. As equipment important to safety is removed from service, alarms are received, meter readings change, status lights change, and/or various light indications change. For removal of equipment important to safety, the shift supervisor is directed by procedure to predetermine whether such indications will give adequate indication of resultant system status and if they will not, he directs a properly qualified individual to verify the resultant lineup.

I.C.6 (Continued)

¹(The following further amplifies the clarification response.)

Equipment important to safety is defined as the reactor coolant system (pressure boundary components) and associated pressurizer and pressure relief system, the residual heat removal system, engineered safety features systems, engineered safety features electric power systems, and cooling water systems necessary to operate the above systems.

Authority to release equipment important to safety for maintenance or surveillance testing or to return equipment important to safety to service is delegated to the on-shift SRO with the stipulation that the shift supervisor be kept fully informed of such status. This release or return to service of equipment important to safety and notification is documented on the document for controlling the work (work request or work authorization).

Plant operators (control room work location) are required to log the removal and return to service of equipment important to safety in the plant operators' log.

Upon return to service of equipment important to safety, a formal verification of the lineup is conducted. The lineup and the verification are performed by individuals qualified on the equipment or system. The lineup and verification include valves, switches, and breakers as appropriate. This verification is documented on the work request, work authorization or procedure as appropriate.

Farley Nuclear Plant verification policies for equipment important to safety include an independent verification by a second person qualified on the system.

Alabama Power has already implemented procedures for equipment status verification upon return to service. The verification procedures for equipment removal will be implemented prior to issuance of a full power operating license.

II.D.1 PERFORMANCE TESTING OF BOILING WATER REACTOR AND PRESSURIZED-WATER REACTOR RELIEF AND SAFETY VALVES

Previous Response

By previous response dated July 17, 1980, July 23, 1980 and August 1, 1980 for Unit 2, and October 24, 1979 and December 31, 1979 for Unit 1, Alabama Power Company described commitments and actions taken for the Farley Nuclear Plant.

Clarification Response

As indicated in the December 15, 1980 letter from R. C. Youngdahl (EPRI) to D. G. Eisenhut (NRC), the present EPRI program does not formally include the testing of block valves. However, a number of block valves have been tested at the Marshall Steam Station Test Facility, and a preliminary scope and cost estimate study for a block valve test program has been completed by the EPRI staff. A detailed block valve test program will not be resolved until after July 1, 1981. Alabama Power Company commits to participating in such an EPRI program and will supply further details as they become available; however, in any event, Alabama Power Company will provide by July 1, 1981 a program description for ensuring block valve qualification by July 1, 1982.

While Alabama Power Company does not support additional ATWS valve Testing until regulatory issues are resolved, the major test facility for the EPRI program was designed to provide the potential for additional valve testing at higher pressures for ATWS conditions.