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Senior Vice President



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Docket Number 50-348
Docket Number 50-364

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

Gentlemen:

This letter is to request exemption for Farley Nuclear Plant Units 1 and 2 from the requirement of 10 CFR 50 Appendix J, paragraph III.D.2(b)(ii) which states:

Air locks opened during periods when containment integrity is not required by the plant's Technical Specifications shall be tested at the end of such periods at not less than P_a .

The basis for this exemption request is that air lock integrity is adequately assured by the provisions of paragraphs III.D.2(b)(i) and III.D.2(b)(iii) and that the requirement of paragraph III.D.2(b)(ii) is excessively restrictive in that it is anticipated to result in one or more days of additional outage time per year on each unit.

Whenever the plant is in Mode 5, Containment Integrity is not required. Hence, if an air lock (Personnel or Auxiliary) is opened in Mode 5, paragraph III.D.2(b)(ii) requires that an overall air lock leakage test at not less than P_a be conducted prior to entry into Mode 4.

Even if the six month test required by paragraph III.D.2(b)(i) is current, to meet the requirement of paragraph III.D.2(b)(ii) no access to the containment can be allowed while preparing to leave Mode 5 until any air lock that has been opened in Mode 5 is tested and the plant has entered Mode 4. To perform this test requires approximately 14 hours on the personnel air lock and 10 hours on the auxiliary air lock. Usually there are several minor operational and maintenance problems that require containment entry prior to entering Mode 4 and the air lock test would have to wait until all problems requiring containment entry were corrected. This is very restrictive and would slow return to operation by at least 24 hours and in most instances longer.

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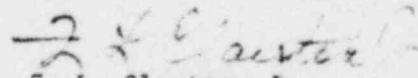
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If the six month test of paragraph III.D.2(b)(i) and the test required by paragraph III.D.2(b)(iii) are current and no maintenance has been performed on the airlock, there is no reason to expect the airlock to leak just because it has been opened in Mode 5 or Mode 6. Thus the additional testing and resulting delay in returning the unit to operation does not seem merited and Alabama Power Company respectfully requests relief from paragraph III.D.2(b)(ii) of 10CFR50 Appendix J.

If you have any questions, please advise.

Very truly yours,


F. L. Clayton, Jr.

FLCJr/HRF:nac

cc: Mr. R. A. Thomas
Mr. G. F. Trowbridge
Mr. J. P. O'Reilly
Mr. L. L. Kintner
Mr. E. A. Reeves
Mr. W. H. Bradford