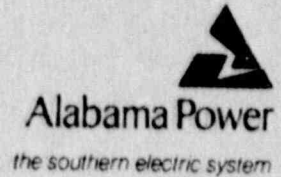


Alabama Power Company  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201  
Telephone 205 868-5581

W. G. Hairston, III  
Senior Vice President  
Nuclear Operations

March 1, 1990



Docket Nos. 50-348  
50-364

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

Gentlemen:

Joseph M. Farley Nuclear Plant - Units 1 and 2  
Request for Voluntary Participation in NRC Regulatory Impact Survey  
(Generic Letter 90-01)

Per Generic Letter (G.L.) 90-01 dated January 18, 1990, the NRC requested input from utilities regarding the amount of time spent by key managers in response to various inspections and audits that are imposed upon them. Alabama Power Company has compiled this information and provides it as an enclosure to this letter.

In agreement with the views presented by INPO in their letter to the NRC dated February 7, 1990, Alabama Power Company has not included the time spent by managers during INPO assistance visits. Alabama Power Company agrees that such visits are typically in response to a utility's request for assistance in a particular area.

Please recognize that the input provided for upper management involvement only reflects the time spent for Farley Nuclear Plant, even though the "Chief Nuclear Officer" and one of the two "Corporate Vice Presidents" have responsibilities for other plants within the Southern Company.

Alabama Power Company appreciates the opportunity to provide input into the NRC's efforts to improve the regulatory process. If there are any further questions, please advise.

Respectfully submitted,

  
W. G. Hairston, III

WGH,III/BHW:mgd 14.36

Enclosure

cc: Mr. S. D. Ebnetter  
Mr. E. A. Reeves  
Mr. G. F. Maxwell

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ENCLOSURE

NRC Regulatory Impact Survey  
Questionnaire Sheet

1. Type of inspection, audit or evaluation: NRC Team Inspections
- 
2. Based on actual experience over the past several years, about how often is this activity conducted? Annually
- 
3. Operations/Construction areas covered: All areas of plant operation, security, fire protection and environmental qualification
- 
4. Extent of the activity (how many people, for how long) 10 people  
for 10 days
- 
5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
- |                               |             |                   |           |
|-------------------------------|-------------|-------------------|-----------|
| a. Plant Department Heads     | <u>540</u>  | (number involved) | <u>9</u>  |
| b. Plant Manager              | <u>68</u>   |                   |           |
| c. Corporate Department Heads | <u>780</u>  | (number involved) | <u>7</u>  |
| d. Corporate Vice Presidents  | <u>56</u>   | (number involved) | <u>2</u>  |
| e. Chief Nuclear Officer      | <u>8</u>    |                   |           |
| f. Other Supervisors          | <u>1310</u> | (number involved) | <u>18</u> |

Note: Times are given in total manhours.

NRC Regulatory Impact Survey  
Questionnaire Sheet

1. Type of inspection, audit or evaluation: Other NRC Resident,  
Regional and Headquarters Inspections/Audits
2. Based on actual experience over the past several years, about how often is this activity conducted? Resident - once per month; Regional and Headquarters - once every 2 weeks
3. Operations/Construction areas covered: All areas of plant operation and emergency preparedness
4. Extent of the activity (how many people, for how long) 1 person for 5 days
5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
- |                               |             |                   |           |
|-------------------------------|-------------|-------------------|-----------|
| a. Plant Department Heads     | <u>650</u>  | (number involved) | <u>9</u>  |
| b. Plant Manager              | <u>112</u>  |                   |           |
| c. Corporate Department Heads | <u>610</u>  | (number involved) | <u>7</u>  |
| d. Corporate Vice Presidents  | <u>200</u>  | (number involved) | <u>2</u>  |
| e. Chief Nuclear Officer      | <u>24</u>   |                   |           |
| f. Other Supervisors          | <u>1866</u> | (number involved) | <u>18</u> |

Note: Times are given in total manhours.

NRC Regulatory Impact Survey  
Questionnaire Sheet

1. Type of inspection, audit or evaluation: INPO Evaluation
- 
2. Based on actual experience over the past several years, about how often is this activity conducted? Every 18 months
- 
3. Operations/Construction areas covered: All areas of plant operation and administration
- 
4. Extent of the activity (how many people, for how long) 15 to 20 people for 10 days
- 
5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
- |                               |             |                   |           |
|-------------------------------|-------------|-------------------|-----------|
| a. Plant Department Heads     | <u>760</u>  | (number involved) | <u>9</u>  |
| b. Plant Manager              | <u>168</u>  |                   |           |
| c. Corporate Department Heads | <u>370</u>  | (number involved) | <u>7</u>  |
| d. Corporate Vice Presidents  | <u>80</u>   | (number involved) | <u>2</u>  |
| e. Chief Nuclear Officer      | <u>16</u>   |                   |           |
| f. Other Supervisors          | <u>1830</u> | (number involved) | <u>18</u> |

Note: Times are given in total manhours.

NRC Regulatory Impact Survey  
Questionnaire Sheet

1. Type of inspection, audit or evaluation: Insurers (ANI) Audits
- 
2. Based on actual experience over the past several years, about how often is this activity conducted? Quarterly
- 
3. Operations/Construction areas covered: Operation and maintenance of plant equipment
- 
4. Extent of the activity (how many people, for how long) 1 person for 1 week
- 
5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
- |                               |            |                   |           |
|-------------------------------|------------|-------------------|-----------|
| a. Plant Department Heads     | <u>180</u> | (number involved) | <u>6</u>  |
| b. Plant Manager              | <u>20</u>  |                   |           |
| c. Corporate Department Heads | <u>50</u>  | (number involved) | <u>3</u>  |
| d. Corporate Vice Presidents  | <u>12</u>  | (number involved) | <u>2</u>  |
| e. Chief Nuclear Officer      | <u>0</u>   |                   |           |
| f. Other Supervisors          | <u>458</u> | (number involved) | <u>10</u> |

Note: Times are given in total manhours.

NRC Regulatory Impact Survey  
Questionnaire Sheet

1. Type of inspection, audit or evaluation: EPA Audits
- 
2. Based on actual experience over the past several years, about how often is this activity conducted? Annually
- 
3. Operations/Construction areas covered: Environmental protection administration and training
- 
4. Extent of the activity (how many people, for how long) 2 people for 1 day
- 
5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
- |                               |           |                   |          |
|-------------------------------|-----------|-------------------|----------|
| a. Plant Department Heads     | <u>20</u> | (number involved) | <u>2</u> |
| b. Plant Manager              | <u>2</u>  |                   |          |
| c. Corporate Department Heads | <u>0</u>  | (number involved) | <u>0</u> |
| d. Corporate Vice Presidents  | <u>0</u>  | (number involved) | <u>0</u> |
| e. Chief Nuclear Officer      | <u>0</u>  |                   |          |
| f. Other Supervisors          | <u>40</u> | (number involved) | <u>2</u> |

Note: Times are given in total manhours.

NRC Regulatory Impact Survey  
Questionnaire Sheet

1. Type of inspection, audit or evaluation: OSHA Audits  
\_\_\_\_\_
2. Based on actual experience over the past several years, about how often is this activity conducted? No recent OSHA audits have been conducted; this audit activity is currently being conducted by the NRC  
\_\_\_\_\_
3. Operations/Construction areas covered: N/A  
\_\_\_\_\_  
\_\_\_\_\_
4. Extent of the activity (how many people, for how long) N/A  
\_\_\_\_\_  
\_\_\_\_\_
5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
- |                               |          |                   |          |
|-------------------------------|----------|-------------------|----------|
| a. Plant Department Heads     | <u>0</u> | (number involved) | <u>0</u> |
| b. Plant Manager              | <u>0</u> |                   |          |
| c. Corporate Department Heads | <u>0</u> | (number involved) | <u>0</u> |
| d. Corporate Vice Presidents  | <u>0</u> | (number involved) | <u>0</u> |
| e. Chief Nuclear Officer      | <u>0</u> |                   |          |
| f. Other Supervisors          | <u>0</u> | (number involved) | <u>0</u> |

Note: Times are given in total manhours.

NRC Regulatory Impact Survey  
Questionnaire Sheet

1. Type of inspection, audit or evaluation: DOT Audits  
\_\_\_\_\_
2. Based on actual experience over the past several years, about how often is this activity conducted? No DOT audits have been conducted in recent years  
\_\_\_\_\_
3. Operations/Construction areas covered: N/A  
\_\_\_\_\_  
\_\_\_\_\_
4. Extent of the activity (how many people, for how long) N/A  
\_\_\_\_\_  
\_\_\_\_\_
5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
- |                               |          |                   |          |
|-------------------------------|----------|-------------------|----------|
| a. Plant Department Heads     | <u>0</u> | (number involved) | <u>0</u> |
| b. Plant Manager              | <u>0</u> |                   |          |
| c. Corporate Department Heads | <u>0</u> | (number involved) | <u>0</u> |
| d. Corporate Vice Presidents  | <u>0</u> | (number involved) | <u>0</u> |
| e. Chief Nuclear Officer      | <u>0</u> |                   |          |
| f. Other Supervisors          | <u>0</u> | (number involved) | <u>0</u> |

Note: Times are given in total manhours.



NRC Regulatory Impact Survey  
Questionnaire Sheet

1. Type of inspection, audit or evaluation: State/Local Authorities
- 
2. Based on actual experience over the past several years, about how often is this activity conducted? Approximately three times per year
- 
3. Operations/Construction areas covered: Hazardous waste, environmental protection, radiation protection (radiography), drinking water, sewage treatment
- 
4. Extent of the activity (how many people, for how long) 2 people  
for 1 day
- 
5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
- |                               |            |                   |          |
|-------------------------------|------------|-------------------|----------|
| a. Plant Department Heads     | <u>100</u> | (number involved) | <u>2</u> |
| b. Plant Manager              | <u>24</u>  |                   |          |
| c. Corporate Department Heads | <u>0</u>   | (number involved) | <u>0</u> |
| d. Corporate Vice Presidents  | <u>24</u>  | (number involved) | <u>2</u> |
| e. Chief Nuclear Officer      | <u>0</u>   |                   |          |
| f. Other Supervisors          | <u>20</u>  | (number involved) | <u>2</u> |

Note: Times are given in total manhours.

NRC Regulatory Impact Survey  
Questionnaire Sheet

1. Type of inspection, audit or evaluation: NRC-Required QA Audits
- 
2. Based on actual experience over the past several years, about how often is this activity conducted? Approximately 30 audits per year
- 
3. Operations/Construction areas covered: All areas of plant operation
- 
4. Extent of the activity (how many people, for how long) 3 people  
for 15 days
- 
5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
- |                               |             |                   |           |
|-------------------------------|-------------|-------------------|-----------|
| a. Plant Department Heads     | <u>880</u>  | (number involved) | <u>9</u>  |
| b. Plant Manager              | <u>48</u>   |                   |           |
| c. Corporate Department Heads | <u>490</u>  | (number involved) | <u>7</u>  |
| d. Corporate Vice Presidents  | <u>176</u>  | (number involved) | <u>2</u>  |
| e. Chief Nuclear Officer      | <u>8</u>    |                   |           |
| f. Other Supervisors          | <u>1296</u> | (number involved) | <u>18</u> |

Note: Times are given in total manhours.

NRC Regulatory Impact Survey  
Questionnaire Sheet

1. Type of inspection, audit or evaluation: Self-Assessments resulting from external commitments
2. Based on actual experience over the past several years, about how often is this activity conducted? Semi-annually
3. Operations/Construction areas covered: Configuration Management
4. Extent of the activity (how many people, for how long) 7 people for 15 days
5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
- |                               |            |                   |           |
|-------------------------------|------------|-------------------|-----------|
| a. Plant Department Heads     | <u>320</u> | (number involved) | <u>9</u>  |
| b. Plant Manager              | <u>68</u>  |                   |           |
| c. Corporate Department Heads | <u>378</u> | (number involved) | <u>7</u>  |
| d. Corporate Vice Presidents  | <u>32</u>  | (number involved) | <u>2</u>  |
| e. Chief Nuclear Officer      | <u>4</u>   |                   |           |
| f. Other Supervisors          | <u>652</u> | (number involved) | <u>14</u> |

Note: Times are given in total manhours.

NRC Regulatory Impact Survey  
Questionnaire Sheet

1. Type of inspection, audit or evaluation: Other: Plant Visits by  
NRC Upper Management
  
2. Based on actual experience over the past several years, about how often is this activity conducted? Approximately 4 visits per year
  
3. Operations/Construction areas covered: Tour of facility including discussion and observation of plant operations and management
  
4. Extent of the activity (how many people, for how long) 2 people for 1 day
  
5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
  - a. Plant Department Heads 64 (number involved) 4
  - b. Plant Manager 48
  - c. Corporate Department Heads 15 (number involved) 2
  - d. Corporate Vice Presidents 48 (number involved) 2
  - e. Chief Nuclear Officer 8
  - f. Other Supervisors 36 (number involved) 2

Note: Times are given in total manhours.