

DEC 30 1982

Docket No. 50-364

Mr. F. L. Clayton  
Senior Vice President  
Alabama Power Company  
Post Office Box 2641  
Birmingham, Alabama 35291

Dear Mr. Clayton:

We have completed a preliminary review of your amendment request for Joseph M. Farley Unit No. 2 dated October 8, 1982, supplemented by letter dated December 10, 1982. You requested deletion of the Technical Specifications (3/4.3.4 Turbine Overspeed Protection) for periodic surveillance testing and inspections of turbine valves. The bases for this requirement is to ensure that turbine overspeed protection instrumentation and turbine speed control valves are operable and will protect the turbine from excessive overspeed. This letter is in response to your request.

In your October 8, 1982 proposal, your staff concluded that the potential to generate a turbine missile from a turbine overspeed condition is well below the NRC criteria, is ineffective and without cost benefits. You also concluded that "Technical Specification 3/4.3.4 can be deleted without an adverse impact on the reliability of the turbine overspeed protection system or without a reduction in overall plant safety."

We have initiated action to obtain a detailed safety review of your contention that the weekly turbine valve testing is unjustified for Farley Unit No. 2. We currently estimate the review would require about one year to complete. Some of our reasons for the lengthy schedule are as follows:

1. This issue, the probability of turbine missile generation, concerns turbine manufacturers in addition to Westinghouse. Our staff is in the process of resolving the issue generically. Specifically, technical reports describing methods and procedures for calculating design speed and destructive overspeed missile generation probabilities have been submitted to us by the Westinghouse Steam Turbine Division and are currently under review. These reviews are scheduled for completion within a year. The results will be directly applicable to Farley Unit No. 2 in that they will establish acceptable methods for setting revised inspection and test schedules and procedures for essentially all Westinghouse turbine governor and overspeed protection systems.

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2. Your staff requests deletion of Technical Specification 3/4.3.4 arguing that accidental trips and refueling shutdowns satisfactorily demonstrate the operability of the turbine overspeed protection system. However, this is not consistent with the current "Functional Test Requirements for Nuclear Turbines" supplied to customers by the Westinghouse Steam Turbine Division.
3. Westinghouse Nuclear Energy Systems Report, WCAP-10161, used to support the request, requires extensive interaction with the manufacturer and cannot be completed on your requested schedule. Prior to completing our review we do not have an adequate basis to reach a decision on your request. We propose to use WCAP-10161 in conjunction with our review of the Westinghouse generic reports on this issue.

In view of the above, we will not be in a position to decide on your request prior to completion of your generic review. Should you desire to appeal this decision, please advise the assigned NRC Project Manager.

Sincerely,

Original signed by:  
S. A. Varga

Steven A. Varga, Chief  
Operating Reactors Branch #1  
Division of Licensing

cc: See next page

*Advised APCO  
(Gerald) by telecon on 1/3/83  
9:15 AM SAK*

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Alabama Power Company

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