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March 23, 1982

Docket Nos. 50-348  
50-364

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



Attention: Mr. Harold R. Denton

Joseph M. Farley Nuclear Plant - Units 1 and 2  
10 CFR 50, Appendix J

Dear Mr. Denton:

Alabama Power Company has been informed that the NRC is currently considering revising 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors." The revision involves eliminating the so called "short duration" test, i.e., integrated leak rate test (ILRT) period of less than 24 hours.

The ILRT program at the Farley Nuclear Plant (FNP) is based on 10 CFR 50, Appendix J; ANSI N 45.4 - 1972; and Bechtel's Topical Report, BN-TOP-1, Revision 1, dated November 1, 1972. All of these documents allow "short duration" testing to meet NRC licensing requirements. Since "short duration" testing has been approved by the NRC for several years and industry experience has proven this method to be a desirable alternative to longer duration testing, Alabama Power Company is opposed to any regulatory change that would eliminate this option.

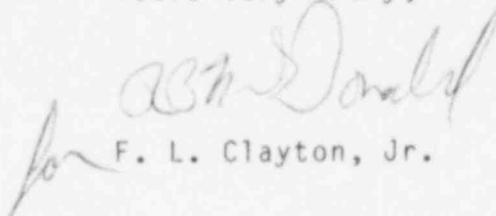
ILRTs represent a significant cost to all utilities due to the complexity and magnitude of this type of testing. Therefore, any change that would add to this cost must be justified on a cost-benefit basis. Alabama Power Company perceives no benefit to the health and safety of the public from an extended duration ILRT. We recommend that the NRC discontinue consideration of such an unnecessary and undesirable revision to 10 CFR 50, Appendix J.

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Alabama Power Company requests that if additional NRC consideration of this revision is planned, the nuclear industry be given ample opportunity to participate and comment on this issue.

Yours very truly,

  
for F. L. Clayton, Jr.

FLCJr/GGY:1sh-D7

cc: Mr. S. J. Chilk  
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Mr. R. J. Mattson  
Mr. L. S. Rubenstein  
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