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the southern electric system

April 23, 1982

Docket Nos: 50-348

50-364

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

Attention: Mr. S. A. Varga

Joseph M. Farley Nuclear Plant - Units 1 and 2 Environmental Qualification

Gentlemen:

Alabama Power Company has reviewed your letter dated March 26, 1982 requesting additional qualification information with regards to TMI Action Plan equipment. The requested information is summarized by the following items (requested for both units unless otherwise noted):

- 1) Identification of TMI Action Plan equipment
  - a) Installed with implementation dates before January 1, 1982 (Unit 2 only).
  - b) Installed with implementation dates after January 1, 1981.
- System Component Evaluation Worksheets for all installed TRI Action Plan equipment (Unit 2 only).
- Correlation of the equipment items with specific sections of NUREG-0737.
- 4) Installation dates for TMI Action Plan equipment.
- Qualification documents cited as evidence of qualification.
- 6) Standard Owner's Group positions and requested extensions to implementation dates regarding NUREG-0737.

Each of these items are discussed below to provide Alabama Power Company's response to your letter.

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Mr. S. A. Varga Director, Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission

### Identification of TMI Action Plan Equipment

By your letter dated January 19, 1982, "Information Regarding the Program for Environmental Qualification of Safety-Related Electrical Equipment (Generic Letter 81-05)," qualification information of TMI Action Plan equipment is required to be submitted in accordance with the schedule delineated in IE Bulletin 79-01B, Supplement No. 3, "Environmental Qualification of Class IE Equipment," dated October 24, 1980, later clarified by NRC letter dated November 26, 1980, "Orders on Environmental Qualification of Safety-Related Electrical Equipment (October 24, 1980)."

Alabama Power Company has a program by which to address the qualification of the TMI Action Plan equipment per the schedule of the licensing requirements. The qualification of the equipment was intended to be submitted in a single supplement to each of the previous Alabama Power Company submittals for IE Bulletin 79-01B and NUREG-0588. A single supplement for each unit is prudent to facilitate the coherence of the information and thoroughness of treatment.

In order to provide for the expeditious review of the qualification of TMI Action Plan equipment, Alabama Power Company will submit these supplements to the previous submittals within 60 days of the date of this letter. The supplements will identify, by plant identification number, all Unit 1 and 2 TMI Action Plan equipment, regardless of the implementation dates, requiring environmental qualification and will provide the System Component Evaluation Worksheets, which will adddress the qualification status of the equipment. The format of the supplements will be consistent with the previous submittals. The supplements will be forwarded directly to the Office of Inspection and Enforcement (Unit 1) and Office of Nuclear Reactor Regulation (Unit 2) as established and required by IE Bulletin 79-01B and NUREG-0588.

# System Component Evaluation Worksheets (SCEW)

As discussed in the previous item, the SCEW's will be submitted with the supplements to previous Alabama Power Company submittals for IE Bulletin 79-01B and NUREG-0588 and will address the qualified status of equipment installed at both Units 1 and 2.

#### Correlation With NUREG-0737

The format for the forthcoming supplements will be consistent with the previous Alabama Power Company environmental qualification submittals. Each supplement section will include an equipment master list that will be properly entitled to provide evident correlation to the specific section of NUREG-0737, "Clarification of TMI Action Plan Requirements." The supplement section will identify all equipment items requiring environmental qualification.

#### Installation Dates

Alabama Power Company has submitted the status of the NUREG-0737 effort for Farley Nuclear Plant in letter dated December 22, 1981. This status identifies the sections of NUREG-0737 that have been completed and scheduled implementation dates.

Alabama Power Company has been requested in a conversation with the NRC Staff to update the status of the NUREG-0737 effort. This information is in preparation and will be provided by June 23, 1982 to the NRC Project Manager for Farley Nuclear Power Plant and will include the implementation dates of all TMI Action Plan equipment.

## Qualification Documents

Per your letters dated January 19 and February 1, 1982 requesting additional qualification information for Units 1 and 2, Alabama Power Company has transmitted a number of qualification documents, including those that are proprietary, in letters dated February 19 and March 2, 1982. Many of those qualification documents will be cited as evidence of qualification by the System Component Evaulation Work Sheets included in the forthcoming supplements to the Alabama Power Company submittals for IE Bulletin 79-01B and NUREG-0588.

Following your review of the supplements, please identify specific qualification documents that have not been previously submitted and are unavailable at your office. Because of the proprietary nature of certain information, Alabama Power Company would be obligated to contact the vendors for authorization to release their qualification documents. Additionally, Alabama Power Company will be unable to provide proprietary Westinghouse qualification documents as stated in letters dated February 19 and March 2, 1982. Requests for such information should be directed

Mr. S. A. Varga April 23, 1982 Director, Nuclear Regulatory Commission Page 4 U. S. Nuclear Regulatory Commission to Westinghouse, which will ensure that the information is, or has been, submitted to the NRC on a timely basis in accordance with an agreement reached between Westinghouse and Mr. E. C. Shomaker of the NRC Office of the Executive Legal Director. Owner's Group Positions and Requested Extensions As previously discussed, the status of the NUREG-0737 requirements have been submitted in letter dated Decemer 22, 1981. This status references the Westinghouse Owner's Group (WOG) position to technical areas of NUREG-0737 and identifies requested exemptions to implementation dates. If you have any questions concerning this matter, please feel free to call. Yours very truly. F. L. Clayton, Jr. FLCJr/MAL:1sh-D9 cc: Mr. R. A. Thomas Mr. G. F. Trowbridge Mr. J. P. O'Reilly Mr. E. A. Reeves Mr. W. H. Bradford