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August 3, 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
Non-Invasive Vessel Level System

Gentlemen:

In letters dated February 8 and June 29, 1981, Alabama Power Company provided a detailed plan for the development, installation, and testing of the FNP Units 1 and 2 prototype vessel level system utilizing excore neutron detectors. The final prototype test was committed for the first refueling outage of Unit 2 and was scheduled for October 1982. The results of these tests were to be used to determine system feasibility. If the system was proven feasible, final development and qualification would have been completed in accordance with the plan provided in the aforementioned letters. As stated in our letter of August 6, 1980, if the system was determined not to meet performance expectations, Alabama Power Company would install a proven alternate system.

Testing of the vessel level systems for Units 1 and 2 was begun in April 1980 and has continued through November 1981. The results of these tests are documented in Alabama Power Company letter dated June 24, 1981 and EPRI Report NP-2354 dated April 1982. As concluded by these tests, "the neutron detector assemblies used at Farley may be able to detect a sudden rise when the water level falls to within four feet of the top of the reactor core." Since such conclusions are not compatible with NUREG-0737, Section II.F.2, clarification (6), which required indication from normal operation (full vessel) to complete core uncover, Alabama Power Company has determined that this system does not meet the required performance standards. Alabama Power Company does not plan to complete the final testing described above.

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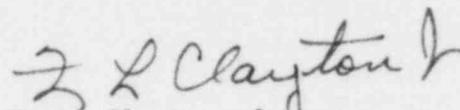
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Alabama Power Company has initiated a review of available vessel level systems to determine their compliance with NUREG-0737 provisions. This review will include compatibility with existing plant systems, lead times, outage schedules, feasibility, etc. A status of this review and plans for complying with the inadequate core cooling criteria will be submitted to the NRC by February 1, 1983.

If there are any questions, please advise.

Yours very truly,


F. L. Clayton, Jr.

FLCJr/RLG:lsh-D23

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