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January 11, 1983

Docket Nos. 50-348
50-364

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

Attention: Mr. D. G. Eisenhut, Director
Division of Licensing

Joseph M. Farley Nuclear Plant - Units 1 and 2
Potential Steam Generator Related Generic Requirements

Dear Mr. Eisenhut:

Alabama Power Company has reviewed the draft report of Generic Letter No. 82-32, "Potential Steam Generator Related Generic Requirements" and provides the attached comments on each of the twelve potential requirements.

As stated in the draft report, there is such a low risk to the health and safety of the public from a steam generator tube rupture such that the implementation of any of the potential requirements would have little impact on further improvements in this already low public risk and would be without cost-benefit. It is the opinion of Alabama Power Company that matters without an impact on the public risk should not become regulatory requirements; cost-benefit decisions without public risk impact should be the prerogative of the individual utilities to account for unique plant designs and the most prudent use of resources.

The Steam Generator Owners Group (SGOG) is continuing to address many of the same matters in the draft report. Some recommendations of the SGOG have already been implemented at operating plants to provide a cost-effective method to extend steam generator life. Additionally, the Westinghouse Owners Group is developing generic procedures to further enhance the capability to mitigate the consequences of multiple steam generator tube ruptures. These utility initiatives and any further technological developments would only be hampered by the promulgation of these potential requirements.

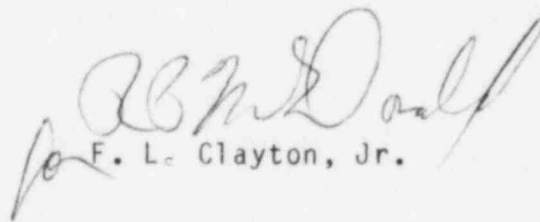
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Consequently, Alabama Power Company recommends that these potential requirements not be promulgated without a demonstration of a reduction of risk to the public health and safety.

Yours very truly,



F. L. Clayton, Jr.

FLCJr/MAL:mjh-D36

Attachment

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

Attachment

(1) Prevention and Detection of Loose Parts and Foreign Objects in Steam Generators

Alabama Power Company supports an initial baseline inspection of the secondary side of steam generators for loose parts. So as not to impact the critical path of an outage, the schedule for this inspection at each plant should be based on the priorities of previous licensing commitments and the schedule of possible near-term maintenance/modifications of major components that could lead to loose parts or foreign objects. Such scheduling could postpone the inspection until a time when actual maintenance/modification is being performed.

Alabama Power Company does not concur that a total inspection of a steam generator for loose parts is required each time a steam generator modification is made or eddy current testing is performed. The scope of each subsequent inspection, such as limited inspections in areas where necessary, should be based on site-specific analysis of the results of inservice inspections and major component maintenance/modification.

Alabama Power Company supports quality assurance/quality control measures described in this section when major components, such as steam generators, are opened.

The implementation of a baseline inspection and an effective quality assurance/quality control system in combination with the necessary subsequent inspections should preclude the need for a loose parts monitoring system. Alabama Power Company believes that the presently available loose part monitoring systems are not sufficiently reliable to preclude costly false alarms and are no substitute for visual inspections and proper quality assurance/quality control. Alabama Power Company therefore opposes the requirement for a steam generator secondary site loose parts monitoring system.

(2) Steam Generator Inservice Inspection Program

Alabama Power Company supports the inspection of steam generator tubes through the entire tube length.

Sample Selection and Testing

Alabama Power Company feels that an eddy current inspection interval of approximately 60 months for the tubing of a steam generator, which has shown no evidence of degradation, would be appropriate. The inspection

interval should be based on criteria that considers plant-specific inspection results and good performance.

Alabama Power Company supports the use of subsets of tubes for special inspections if the subsets have demonstrated unique problems. Satisfactory inspection of such subsets could preclude the necessity to expand the inspection into the next category. The minimum sample size for the general inspection should take at least partial credit for the inspection of subsets giving due consideration to the special features or phenomena determined during subset inspection.

Supplementary Sampling Requirements

Alabama Power Company concurs with continuing the STS category C-1 for initial inspection sample size. The potential requirement to inspect all tubes in the steam generator or to perform excessive analyses and calculations if one or more tubes are defective or five or more percent of the tubes are degraded, however, appears to be completely without merit. Alabama Power Company is not prepared to make assumptions that exceed those of the FSAR design basis analyses such as SGTR concurrent with a MSLB. Analyses and calculations based on such assumptions could add little to the conclusions reached regarding steam generator tube inspections. Alabama Power Company recommends retaining the presently defined three (3) inspection categories.

Inspections for Denting

Alabama Power Company supports some type of routine inspection for denting. Further evaluation is necessary, however, before inspection/recommendation criteria should be issued to licensees.

Inspection Intervals

Alabama Power Company does not believe that unscheduled eddy current inspections should be mandated on an across-the-board basis. When the technology is available to determine if a mechanistic-type failure is developing in a steam generator, each plant should determine the appropriate inspection interval. Otherwise, critical path outage time would be required for such inspections to resolve a condition that did not exceed Technical Specification limits. Under these requirements, Alabama

Power Company believes that the incentive to repair a leak below technical specification limits would be diminished. In order to encourage the repair of such leaks, the inservice inspection program developed by each utility, such as sampling size or inspection intervals, could take into consideration the incentive for taking corrective actions prior to a leak reaching technical specification limits.

Acceptance Limits

Alabama Power Company does not feel that acceptance limits for denting should be incorporated in the technical specifications unless sufficient research is performed to substantiate preventive plugging criteria. Rather, an inspection program containing an acceptance criteria that is submitted to the NRC for review and approval could better serve the industry by considering specific plant design, unique developments and previous inspection results.

Reporting

Alabama Power Company does not object to providing the NRC with reports concerning steam generator tube inspections, however, opposes these reports being used as a means to restrict the return to power operation. Inspections performed according to the requirements of the inservice inspection program and subject to adequate acceptance criteria provides assurance of continued safe operation of a unit. Administrative delays in the return of a unit to power operation is not a substitute for an inservice inspection program performed in accordance with predetermined acceptance criteria.

(3) Improved Eddy Current Testing Techniques

Alabama Power Company currently uses multi-frequency and absolute coil eddy current testing techniques but believes these techniques must be adopted on a plant specific basis.

(4) Upper Inspection Port

Upper inspection ports are installed in Unit 2 steam generators at Farley Nuclear Plant. Alabama Power Company does not feel that the requirement to install upper inspection ports on steam generators should be mandated for all plants. Ports should be installed on steam generators if the inspection port could be of benefit in either solving or determining the cause of a demonstrated problem.

(5) Secondary Water Chemistry Program

Alabama Power Company has already incorporated the September 1981 PWR Secondary Water Chemistry Guidelines into its chemistry program to minimize steam generator tube degradation. Such programs must, however, be tailored to plant specific design. Absolute requirements to reduce power or shutdown units may not be the most prudent action in all cases when adverse chemistry conditions exist. More evaluation is recommended prior to adoption by individual plants.

(6) Condenser Inservice Inspection Program

Alabama Power Company supports a comprehensive condenser inspection and maintenance program. It is believed that there is no basis for a generic requirement to reduce power as a consequence of condenser leakage. The specific inspection, maintenance and operating program should be based upon the type of condenser installed at each facility and its performance. Incentives to properly maintain condensers should not be provided through the regulatory process.

(7) Study of Alternative Methods of Stabilization and Monitoring of Degraded Tubes in Steam Generators

Alabama Power Company is not familiar with the engineering technology necessary to either monitor the further degradation of plugged non-leaking steam generator tubes or to stabilize degraded tubes. Until proven technology that provides quantifiable indications with recognized action levels is developed in these areas, this monitoring should only be implemented on a plant specific basis.

(8) Primary to Secondary Leakage Rate Limits

Farley Nuclear Plant Technical Specifications for such operational leakage are identical to the Standard Technical Specifications. Alabama Power Company supports the Standard Technical Specification criteria but does not believe the criteria should be mandated for plants without consideration of the past history of steam generator performance and the design basis event analyses.

(9) Standard Technical Specification Limit for Coolant Iodine Activity

Farley Nuclear Plant Technical Specifications for Coolant Iodine limits are identical to the Standard Technical Specifications. Alabama Power Company supports the Standard Technical Specification criteria but does not believe the criteria should be mandated for plants without consideration of the past history of steam generator performance and the design basis event analysis.

(10) Study of Reactor Coolant System Pressure Control During a Steam Generator Tube Rupture

This issue is presently being analyzed for Westinghouse plants by the Westinghouse Owners Group. Responsibility for this analysis should remain vested with this group.

(11) Safety Injection Signal Reset

During a safety injection at Farley Nuclear Plant, pump suction automatically shifts to the refueling water storage tank. Alabama Power Company believes that the need for initial suction from the boric acid storage tank should be based on the plant specific design basis event analysis.

(12) Containment Isolation and Reset

Alabama Power Company agrees with the recommendation that orifice isolation valves should not reopen with the letdown line isolated. Orifice isolation valves at FNP close on a safety injection signal and will not open unless the operator resets the safety injection signal and places the valve control switch in the open position.