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Alabama Power
the southern electric system

September 30, 1982

Docket No. 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 - Unit 2
Environmental Qualification of Electrical Equipment

Gentlemen:

In letter dated June 23, 1982, Alabama Power Company provided the qualification status of TMI Action Plan Equipment addressed by NUREG-0737, "Clarification of TMI Action Plan Requirements." The status verified that all installed TMI Action Plan equipment located in a possible harsh environment, with the exception of four outstanding items, have full qualification documentation. The four outstanding items were discussed and a schedule was provided to implement full qualification. The installation of the equipment associated with the four outstanding items was performed prior to the completion of the vendor environmental qualification test reports in order to establish compliance with the required implementation dates of NUREG-0737.

Specifically, Alabama Power Company installed Victoreen Radiation Monitor Detectors before exceeding 5% power in 1981 prior to the completion of the vendor environmental qualification test programs so as to provide state-of-the-art equipment consistent with the implementation schedule of NUREG-0737, II.F.1.3. The environmental qualification test report for the radiation detectors was evaluated upon its receipt. The design and procurement of the water-tight fitting was subsequently initiated in order to establish similarity with the test specimen and thereby ensure adequate qualification of the FNP specimen. Material required to install the water-tight fitting is presently expected to be delivered during the first quarter of 1983.

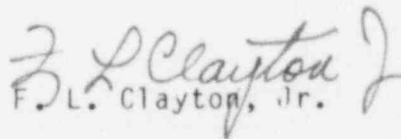
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The installation of a water-tight fitting on the Victoreen Radiation Detectors was scheduled for the first refueling outage. Due to the unfavorable material delivery schedules, the installation of the water-tight fittings to the Victoreen Radiation Detectors can not be completed during the first refueling outage. Completion of the modification is presently scheduled for the first outage of sufficient duration contingent upon receipt of material. The present critical path schedule of the first refueling outage requires the establishment of containment integrity during the last week of November 1982, which is prior to the presently expected delivery dates of the material. At the present time, there are no foreseen difficulties with satisfying the modification schedule for the remaining three outstanding items per the aforementioned letter.

The Victoreen Radiation Detectors were installed to satisfy the requirements of NUREG-0737 and would be used to detect a radiation release due to an improbable breach of the reactor coolant pressure boundary. The radiation detectors are not essential to achieve a safe shutdown condition under any design basis event. The maintenance of critical safety functions in accordance with the emergency operating procedures at Farley Nuclear Plant are not dependent on the high range containment radiation monitors to mitigate the consequences of a breach of the reactor coolant pressure boundary or to achieve a safe shutdown condition. Post-accident sampling of the containment atmosphere and reactor coolant is available to determine the extent of possible core damage which could result in radiation releases to the containment atmosphere. Therefore, the delay in the installation of a water-tight fitting to establish full environmental qualification of the Victoreen Radiation Detectors would not jeopardize the safe operation of the Farley Nuclear Plant. The environmental qualification of all electrical equipment that is located in a possible harsh environment and essential to achieve a safe shutdown condition is verified in Alabama Power Company responses to NUREG-0588. Consequently, interim operation to the next outage of sufficient duration to complete the modification is justified as described herein.

If there are any questions regarding this matter, please contact this office.

Yours very truly,


F. L. Clayton, Jr.

Mr. S. A. Varga
U. S. Nuclear Regulatory Commission

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