Alabama Power Company 40 Inferness Center Parkway Post Office Box 1295 Birmingham, Alabama 35201 Telephone 205 868-5581

W. G. Hairston, III Senior Vice President Nuclear Operations



December 5, 1990

10CFR20

Docket Nos, 50-348 50-364

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D. C. 20555

Gentlemen:

Joseph M. Farley Nuclear Plant Worker Respiratory Protection Apparatus Exemption Revision Request

By letter dated January 13, 1984, Alabama Power Company requested an exemption to 10CFR20, Appendix A to allow the use of GMR-I respiratory protection canisters with full face negative pressure respirators. This exemption was granted by the NRC on October 23, 1984. On February 19, 1990 Alabama Power Company requested a revision to this exemption to allow storage of GMR-I canisters in a Class C environment. Subsequent to Alabama Power Company's request to revise this exemption, the NRC raised another concern related to the protection fit factor of respirators with which the GMR-I canisters will be used. The NRC stated that a respirator fit factor equal to or greater than ten times the 10CFR20 allowed protection factor for negative pressure full face respirators is required.

Alabama Power Company committed to a respirator protection fit factor of greater than 100 in its original January 13, 1984 exemption request. This exemption was approved without question. However, to accommodate current NRC concerns, Alabama Power Company commits to only use GMR-I canisters with full facepiece respirators capable of providing a fit factor equal to or greater than 500.

It is requested that the revision to the exemption to allow storage of GMR-I canisters in a Class C environment be granted by March 1, 1991.

If you have any questions, please advise.

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Respectfully submitted,

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W. G. Hairston, III

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cc: Mr. S. D. Ebneter Mr. S. T. Hoffman Mr. G. F. Maxwell