Mailing Address Alabama Power Company 600 North 18th Street Post Office Box 2641 Birmingham, Alabama 35291 Telephone 205 783-6081

F. L. Clayton, Jr. Senior Vice President Flintridge Building



November 24, 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 Technical Specification Amendment to Incorporate License Condition Requirements

Gentlemen:

On October 22, 1982, Joseph M. Farley Nuclear Plant - Unit 2 shut down for the first refueling outage. In accordance with the operating license, NPF-8, some design changes and submittal of additional information prior to startup following the first refueling outage are required. Specifically, the requirements that affect the technical specifications are: the addition of containment penetration overcurrent protection devices, license condition 2.C.(19)(b); replacement of the containment vent valves, license condition 2.C.(17); and tabulation of a list of safety-related mechanical snubbers, Technical Specification Table 3.7-4b. Therefore, proposed technical specification changes, as contained herein, are respectfully requested to provide conformance with the aforementioned license conditions.

License Condition 2.C. (19)(b)

License condition 2.C.(19)(b), as amended, requires the modification of circuit protection devices in the containment penetration circuits. The modifications are described in the Alabama Power Company letter of November 17, 1980, and were approved in the NRC Safety Evaluation Report, Supplement No. 5, dated March 1981.

Many of the required circuit modifications will be completed during the first refueling outage while the remainder of the modifications will be completed no later than the second refueling outage. Since it will not be known exactly how many of the modifications will be completed until just prior to startup from the first refueling outage, all of the

8211290658 821124 PDR ADOCK 05000364 PDR

Mr. S. A. Varga Director Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission November 24, 1982 Page 2

circuit modifications are included in the proposed technical specification table change (Table 3.8-1) with a footnote stating that only the installed protection devices will be covered by the requirements of section 3/4.8.3.1 until the second refueling, at which time all protection devices listed will be covered. This approach allows early submittal of the proposed technical specification table change and eliminates the need for a subsequent technical specification change during the second refueling outage.

Some changes to the November 17, 1980 proposed design have been made and are reflected in the proposed technical specification change. All of the changes are in accordance with licensing requirements and these changes are described in detail in Attachment 1.

This proposed change to Technical Specification Table 3.8-1 is in accordance with license condition 2.C.(19)(b) as described in Attachment 1. This change is made to bring the Unit 2 Technical Specifications into conformance with previously approved plant design changes such that no technical or safety issues are involved. Therefore, this change is administrative in nature per 10CFR170.22 and does not involve an unreviewed safety question.

## License Condition 2.C.(17)

License condition 2.C.(17) requires the installation of a modified vent valve system prior to startup following the first refueling. The modified system is described in the Alabama Power Company letters of September 30 and October 30, 1981.

The modified design involves replacing the existing 18" mini-purge valve with an 8" vent valve. This change affects the description of the containment ventilation system in Technical Specification 3/4.6.1.7 but does not affect the technical requirements for the ventilation system. As stated in the September 30 and October 30, 1981 letters, the modified design complies with the requirements of Branch Technical Position CSB-6-4.

This proposed change to Technical Specification 3/4.6.1.7 is in accordance with license condition 2.C.(17) as described in Attachment 1. This change is made to bring the Unit 2 Technical Specifications into conformance with a previously approved plant design change such that no technical or safety issue is involved. Therefore, this change is administrative in nature per 10CFR170.22 and does not involve an unreviewed safety question. Mr. S. A. Varga Director Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission November 24, 1982 Page 3

#### Technical Specification Table 3.7-4b

Unit 2 Technical Specification Table 3.7-4b contains a requirement that the list of safety-related mechanical snubbers be provided prior to startup following the first refueling outage. The required list is contained in Attachment 2 to this letter.

This proposed change to Technical Specification Table 3.7-4b is in accordance with the technical specification requirement as described in Attachment 1. This change adds the list of mechanical snubbers to the technical specifications and does not involve a plant design change. Therefore, this change is administrative in nature per 10CFR170.22 and does not involve an unreviewed safety question.

# Conclusion

The above described changes have been reviewed by Alabama Power Company's Plant Operations Review Committee and it has been concluded that the proposed changes do not involve an unreviewed safety question. A detailed safety evaluation is contained in Attachment 1 and the proposed technical specification changes are contained in Attachment 2. The Nuclear Operations Review Board will review this proposed change during its next meeting.

This amendment is designated as Class II in accordance with 10CFR170.22 requirements, since it is administrative in nature and does not involve a safety issue (i.e., all of the change are in accordance with NRC imposed license conditions). Enclosed is a check for \$1,200 to cover the total amount of fees required.

In accordance with 10CFR50.30(c)(1)(i), three signed originals and forty (40) additional copies of the proposed changes are enclosed.

Yours very truly,

7. D Clayton / F. L. Clayton, Jr.

SWORN TO AND SUBSCRIBED BEFORE ME THIS 24 DAY OF Norenau , 1982.

FLCJr/GGY:jc-D31 Attachments cc: Mr. R. A. Thomas Mr. G. F. Trowbridge Mr. J. P. O'Reilly Mr. E. A. Reaves Mr. W. H. Bradford

My Commission Expires:

11-29-82

Renda Humber Notary Public

#### ATTACHMENT 1

# Safety Evaluation for Proposed Changes to the FNP-2 Technical Specifications

#### I. Background

On October 22, 1982, Joseph M. Farley Nuclear Plant - Unit 2 shut down for the first refueling outage. In accordance with the operating license, NPF-8, some design changes and submittal of additional information prior to startup following the first refueling outage are required. Specifically, the requirements that affect the technical specifications are: the addition of containment penetration overcurrent protection devices, license condition 2.C.(19)(b); replacement of the containment vent valves, license condition 2.C.(17); and tabulation of a list of safety-related mechanical snubbers, Technical Specification Table 3.7-4b. Therefore, proposed technical specification changes, as contained in Attachment 2, are necessary to provide conformance with the aforementioned license conditions.

#### II. References

Operating License NPF-8 as amended FNP-2 Technical Specifiations

#### III. Bases

## License Condition 2.C.(19)(b)

License condition 2.C.(19)(b), as amended, requires the modification of circuit protection devices in the containment penetration circuits. The modifications are described in the Alabama Power Company letter of November 17, 1980, and were approved in the NRC Safety Evaluation Report, Supplement No. 5, dated March 1981.

Many of the required circuit modifications will be completed during the first refueling outage while the remainder of the modifications will be completed no later than the second refueling outage. Since it will not be known exactly how many of the modifications will be completed until just prior to startup from the first refueling outage, all of the circuit modifications are included in the proposed technical specification table change (Table 3.8-1) with a footnote stating that only the installed protection devices will be covered by the requirements of section 3/4.8.3.1 until the second refueling, at which time all protection devices listed will be covered. This approach allows early submittal of the proposed technical specification table change for a subsequent technical specification table change during the second refueling outage.

Some changes to the November 17, 1980 proposed design have been made and are reflected in the proposed technical specification change. All of the changes are in accordance with licensing requirements. The specific changes to the modifications detailed in the November 17, 1980 letter are:

> These circuits were categorized as "maybe occasionally required for short periods of time" and were therefore not listed as needing backup protection. Since then, Alabama Power Company has decided to provide both primary and backup protection to this category of circuits as follows:

## A. Table 2 - 600V AC Load Centers

Reactor Polar Crane, powered from 600V L/C Breaker EA04, has been provided with backup protection MSCP Type "X" fuse in the Penetration Protection Cabinet.

## B. Table 3 - 600V AC Motor Control Centers

These circuits have been provided with backup protection by adding MSCP fuses in the circuits.

Service	Feecer Compartment	Type of Fuse
CTMT Gib-Crane	FC-M4L	S
CTMT Gib-Crane	FC-S3R	S
CTMT Elev. #3 Controller	FB-A4R	S
CTMT Gib-Crane	FD-H7R	S
Reactor Cavity Cool* Fan MOV 3310-B	FB-02	S

- \* Not included in original study
- These circuits were categorized as not needing backup protection since the existing breakers were determined to be adequate. However, due to a review of the design calculations, backup protection was determined to be needed as follows:

## Table 4 - 208V AC Motor Control Centers

These circuits have been provided with backup protection by adding MSCP fuses in circuit.

Service	Feeder Compartment	Type of Fuse
Reactor Cavity H2 Dil. Fan 2A	HA-03	N

H<sub>2</sub> Dil. Fan 2B

Service	Feeder Compartment	Type of Fuse
Reactor Cavity	HB-N7	N

3. These circuits were proposed to be protected by MSCP fuses. However, due to design changes in the circuits, other backup protection has been provided by circuit breakers.

#### A. Table - 3 600V AC Motor Control Centers

The following backup protection is provided instead of MSCP Type "U" fuses:

Service	Feeder Compartment	Protection	
Accumulator 2A Discharge Valve	FU-Z2	Q2R18B032-A (HE63-B050)	
Accumulator 2C Discharge Valve	FU-Z3	Q2R18B031-A (HE63-B050)	
Accumulator 2B Discharge Valve	FV-S2	Q2R18B035-B	

#### B. Table - 10 Lighting Panels

The MSCP Type "Y" fuses proposed for lighting panels have been deleted as a result of modifications that introduce a local control panel outside containment for each lighting panel. These local control panels have a breaker to provide backup protection.

Rackun

Service		Feeder	Compartment	Protection
LTG. PNL.	20		EB09	N2T51L003D-N
LTG. PNL.	2R		EB09	N2T51L003A-N
LTG, PNL.	2 P		EC13	N2T51L003C-N
LTG. PNL.	20	1.1.1	EC13	N2T51L003B-N

4. The primary and backup protection for the Digital Rod Position Control and Indication were not included in the original Table -4, 208 VAC Motor Control Centers. Due to a review of the tables, this situation was identified and these protection circuits are now included in the technical specifications.

> Additionally, the primary protection trip setpoints and response times have been changed to reflect actual test procedures. The changes do not represent changes in the operating characteristics of the circuit breakers nor in the analysis of the breakers performance. The changes are in accordance with the original analysis and reflect margins included per the manufacturers recommendations/time current characteristic curves.

In conclusion, this proposed change to Technical Specification Table 3.8-1 is in accordance with license condition 2.C.(19)(b) and does not raise any new technical or safety issues. This change is made to bring the Unit 2 Technical Specifications into conformance with previously approved plant design changes. No unreviewed safety question is involved.

## License Condtion 2.C.(17)

License condition 2.C.(17) requires the installation of a modified vent valve system prior to startup following the first refueling. The modified system is described in the Alabama Power Company letters of September 30 and October 30, 1981.

The modified design involves replacing the existing 18" mini-purge valve with an 8" vent valve. This change affects the description of the containment ventilation system in Technical Specification 3/4.6.1.7 but does not affect the technical requirements for the ventilation system. As stated in the September 30 and October 30, 1981 letters, the modified design complies with the requirements of Branch Technical Position CSB-6-4.

In conclusion, this proposed change to Technical Specification 3/4.6.1.7 is in accordance with license condition 2.C.(17) and is being made to bring the Unit 2 Technical Specifications into conformance with a previously approved plant design change. No unreviewed safety question is involved.

### Technical Specification Table 3.7-4b

Unit 2 Technical Specification Table 3.7-4b contains a requirement that the list of safety-related mechanical snubbers be provided prior to startup following the first refueling outage. The required list is contained in Attachment 2.

This proposed change to Technical Specification Table 3.7-4b is in accordance with the Technical Specification requirement and simply adds the list of mechanical snubbers. A plant design change is not involved nor is an unreviewed safety question involved.

## IV. Conclusion

Alabama Power Company respectfully requests the proposed technical specification changes contained in Attachment 2 to provide conformance with the above described license conditions. This proposed change does not involve an unreviewed safety question as defined by 10CFR50.59.