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REGIONAL OFFICE  
ATLANTA, GEORGIA



**Alabama Power**

*the southern electric system*

DEC 27 11:04

December 21, 1982

Docket Nos. 50-348  
50-364

Mr. J. P. O'Reilly  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II, Suite 3100  
101 Marietta Street N. W.  
Atlanta, GA 30303

Farley Nuclear Plant 1982 Systematic Assessment of License  
Performance (SALP)  
NRC Report Nos. 50-348/82-28 and 50-364/82-28

Dear Mr. O'Reilly:

During the SALP review by NRC with APCo in a meeting on December 14, 1982, there were discussions concerning the SALP evaluations of fire protection and licensing activities. In the meeting, Alabama Power Company presented information about performance in these activities that seemed contradictory to analyses in the SALP evaluation.

Concerning fire protection, in paragraph 5a of the SALP analysis the following is stated: "... one deviation and several open items remain outstanding on these modifications. These items include: ... lack of physical examinations required for fire brigade members; substandard welding and cutting fire prevention procedures; ---". Based upon our knowledge, these requirements are for a formal physical examination of fire brigade members and the requirement for limiting flame permits to 24 hours. These requirements are contained in 10 CFR 50, Appendix R, Sections H and K.5., respectively. Alabama Power Company, in Mr. F. L. Clayton, Jr.'s letter of March 19, 1981 to Mr. S. A. Varga (NRC), had indicated that these sections were not applicable to operating nuclear plants like the Farley Nuclear Plant (Ref: 10 CFR 50.48(b)). It is, therefore, requested that these issues be closed

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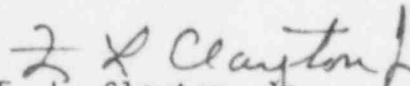
Mr. J. P. O'Reilly  
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and removed from the SALP report. It was noted in the SALP meeting that Alabama Power Company has a physical screening program for fire brigade members which includes: annual physical examinations (optional to employees to age 35 but required for employees 35 years old and above); annual pulmonary functional tests for all fire brigade members; and annual physical agility tests for all security personnel, many who are in the fire brigade. An effective flame permit criteria and guidance currently exist in Farley Nuclear Plant procedures.

Concerning licensing activities, paragraph 9a of the SALP evaluation contains a descriptive analysis of licensing performance that appears to have several content errors and to be out of context with the SALP evaluation criteria as delineated by NRC officials at the meeting. Alabama Power Company presented detailed information at the meeting to support this contention. It is requested that the entire evaluation of licensing activities be reviewed in view of the information presented. A rigorous evaluation of licensing activities using the factual information provided by Alabama Power Company and the SALP criteria as delineated by the NRC representatives is needed. APCo needs this to resolve whether our performance which we view as management intensive, engineering and technically intensive, contributive to safety, and timely has, in fact, been that or if we need a new perspective.

Yours truly,

  
F. L. Clayton, Jr.

FLCJr/RLG:lsh-D33

cc: Mr. R. A. Thomas  
Mr. G. F. Trowbridge  
Mr. D. G. Eisenhut  
Mr. G. C. Lainas  
Mr. S. A. Varga  
Mr. E. A. Reeves  
Mr. W. H. Bradford