

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



Alabama Power
the southern electric system

October 19, 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
Request for Amendment to the Operating License

Gentlemen:

The operating license for the Joseph M. Farley Nuclear Plant - Unit 2 was issued on March 31, 1981, containing several license conditions related to generic issues such as fire protection (Appendix R), environmental qualification (NUREG-0588) and the TMI action plan (NUREG-0737). Alabama Power Company is dependent on other organizations for resolving these license conditions and the schedules for resolving many of these generic issues exceed the completion dates in the license. At the time the license was issued, the license condition completion dates were based on the schedules contained in governing generic regulatory documents. However, since issuance of the license, several regulatory changes have occurred affecting both the scope and schedule for these generic issues.

Due to the nature of a license condition, any change in scope or schedule for completion requires an amendment. As a result, Alabama Power Company must seek amendments to the license when changes to the schedule for completion of generic license conditions occur, even though the NRC is cognizant of and, in some cases, was a party to the revised schedules. This situation requires considerable effort to prepare the amendment request, prepare a safety evaluation, have the proposed amendment reviewed by the Plant Operations Review Committee and the Nuclear Operations Review Board, and finally submit the package to the NRC. This process is necessary even though the NRC may have previously accepted a generic change in the schedule for an industry effort such as emergency operating procedures guidelines. The result is a nonproductive duplication of effort by both Alabama Power Company and the NRC.

8210250090 821019
PDR ADDCK 05000364
P PDR

ADD!
check #12,300

Mr. S. A. Varga
Director, Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission

October 19, 1982
Page 2

Alabama Power Company has identified in the attached list (Attachment 1) all the license conditions and commitments that are redundant to other generic licensing action. These identified licensing conditions are considered open issues although their resolution is controlled by other regulatory action such as I&E Bulletins, Code of Federal Regulations, rules and criteria on environmental qualification, and implementation of requirements for emergency response capability which are to be issued in the near future.

Alabama Power Company respectfully requests that the license conditions listed in Attachment 1 be deleted from the Unit 2 Operating License. This action would not affect the commitments previously made by Alabama Power Company regarding resolution of these generic issues and these issues will continue to be resolved per the governing generic regulatory documents. Since this proposed change to the operating license does not modify any previous licensing commitments made by Alabama Power Company, there is no adverse impact on resolution of the outstanding generic issues or on overall plant safety.

Alabama Power Company's Plant Operations Review Committee has reviewed this proposed change to the license and has determined that this change does not involve an unreviewed safety question as shown in attached safety evaluation (Attachment 2). The Nuclear Operations Review Board is scheduled to review this change at the next meeting.

This proposed amendment is designated as Class IV for Unit 2 in accordance with 10CFR170.22 requirements. Enclosed is a check for \$12,300.00 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.

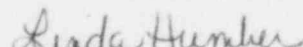
Yours very truly,


F. L. Clayton Jr.

FLCJr/GGY:jc-D29
Attachments

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

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 20th DAY OF October, 1982.



Notary Public

My Commission Expires:

11-29-82

ATTACHMENT 1

Joseph M. Farley Nuclear Plant - Unit 2 License Conditions that are Redundant to Generic Regulatory Items

2.C.(6) Fire Protection

License Condition: Comply with the applicable requirements of the FNP Fire Protection Program Reevaluation, dated September 15, 1977, 10CFR50.48 and Appendix R to 10CFR50.

Governing Regulatory Document: 10CFR50.48 and Appendix R.

Commitments: Alabama Power Company letter dated June 18, 1982, contains the schedule for resolution of outstanding issues and requests for certain exemptions.

Request: Since this license condition is redundant to the governing regulatory document, Alabama Power Company requests that it be deleted.

2.C.(16) Masonry Walls

License Condition: Complete modifications necessary to assure the structural integrity of safety-related masonry walls per IE Bulletin 80-11 prior to startup following the first refueling outage.

Governing Regulatory Document: IE Bulletin 80-11.

Commitments: In letter dated August 26, 1982, Alabama Power stated that the information submitted to the NRC fully documents the structural integrity of all masonry walls at the Farley Nuclear Plant, and that the requirements of the Unit 2 license condition have been satisfied.

Request: Since this license condition is redundant to the governing regulatory document, Alabama Power Company requests that it be deleted.

2.C.(18) Environmental Qualification

License Condition: Comply with the requirements of NUREG-0588 on environmental qualification by June 30, 1982.

Governing Regulatory Document: NUREG-0588 and 10CFR50.49.

Commitments: Alabama Power Company has made several submittals relating to NUREG-0588 that are currently being reviewed by the NRC. The date of June 30, 1982 has been suspended by the NRC pending finalization of a new rule on environmental qualification. Deletion of this license condition would not affect any previous commitments made by Alabama Power Company on environmental qualification.

Request: Since this license condition is redundant to the governing regulatory documents and is in conflict with 10CFR50.49, Alabama Power Company requests that it be deleted.

2.C.(20) Regulatory Guide 1.97, Revision 2

License Condition: Submit a schedule for compliance with Regulatory Guide 1.97, Rev. 2, by April 30, 1981.

Governing Regulatory Document: Regulatory Guide 1.97, Rev. 2 and the to-be-issued 10CFR50.54(f) letter associated with SECY 82-111.

Commitments: Alabama Power Company completed compliance with this license condition by submitting a letter dated March 30, 1981. A subsequent letter dated November 16, 1981 requested that the NRC finalize the regulatory criteria before Alabama Power Company commits to a plan and schedule for compliance. Therefore, deletion of this license condition would not affect compliance commitments.

Request: Since this license condition has been met and future commitments will be based on the to-be-issued 10CFR50.54(f) letter associated with SECY 82-111 and the subsequent NRC confirmatory letter, Alabama Power Company requests that this license condition be deleted.

2.C.(21)(a) Emergency Operating Procedures

License Condition: Upgrade the emergency procedures and associated operator training per NUREG-0737, Item I.C.1, prior to startup following the first refueling.

Governing Regulatory Document: NUREG-0737, Item I.C.1, and the to-be-issued 10CFR50.54(f) letter associated with SECY 82-111 and the subsequent NRC confirmatory letter.

Commitments: Alabama Power Company has made several submittals relating to NUREG-0737, Item I.C.1, and has referenced the Westinghouse Owners Group transmittal of November 30, 1981. As stated in letter dated June 4, 1982, APCo will respond to Commission action when the revised implementation schedule has been published. Therefore, deletion of this license condition would not affect compliance commitments.

Request: Since this license condition is dependent on the to-be-issued 10CFR50.54(f) letter associated with SECY 82-111 and the subsequent NRC confirmatory letter, Alabama Power Company requests that this license condition be deleted.

2.C.(21)(b) Reactor Coolant System Vents

License Condition: Complete installation of reactor coolant system vents prior to July 1, 1982 and submit operating procedures associated with the vents by July 1, 1981.

Governing Regulatory Document: NUREG-0737, Item I.C.1 and II.B.1, and the to-be-issued 10CFR50.54(f) letter associated with SECY 82-111 and the subsequent NRC confirmatory letter.

Commitments: Alabama Power Company has completed all installation work associated with the reactor coolant system vents as documented in letters dated June 25, 1981 and December 22, 1981. Operating procedures were addressed in the Westinghouse Owners Group letter dated November 30, 1981. Emergency operating procedures criteria are being amended by the NRC per SECY 82-111. Therefore, deletion of this license condition would not affect compliance commitments.

Request: Since this license condition will be superceded by the to-be-issued 10CFR50.54(f) letter associated with SECY 82-111 and the subsequent NRC confirmatory letter, Alabama Power Company requests that this license condition be deleted.

2.C.(21)(g) Reactor Vessel Level Instrument

License Condition: Provide detailed design information and Unit 1 test results for a reactor vessel water level instrument by July 1, 1981, and provide a complete development and feasibility program plan by January 1, 1982.

Governing Regulatory Document: NUREG-0737, Item II.F.2.

Commitments: Alabama Power Company completed compliance with this license condition by submitting a letter dated June 29, 1981. A subsequent letter dated August 3, 1982 stated that a plan for complying with NUREG-0737, Item II.F.2, will be submitted to the NRC by February 1, 1983.

Request: Since this license condition has been met and present commitments are based on the governing regulatory document, Alabama Power Company requests that this license condition be deleted.

2.C.(21)(h)(1) Analysis of Thermal Mechanical Conditions

License Condition: Prior to January 1, 1982, submit a detailed analysis of the thermal mechanical conditions in the reactor vessel during recovery from small break LOCAs with an extended loss of all feedwater.

Governing Regulatory Document: NUREG-0737, Item II.K.2.13.

Commitments: Alabama Power Company, as a member of the Westinghouse Owners Group, is participating in a program consisting of analysis for generic Westinghouse PWR plant groupings as outlined in APCo's letter dated December 22, 1981. Therefore, deletion of this license condition would not affect this issue since it is being handled by the generic efforts of the Westinghouse Owners Group.

Requests: Since this license condition is based on the governing regulatory document and the generic efforts of the Westinghouse Owners Group, Alabama Power Company requests that this license condition be deleted.

2.C.(21)(h)(2) Voiding in the Reactor Coolant System

License Condition: Prior to January 1, 1982, provide an analysis of the potential for voiding in the reactor coolant system during anticipated transients prior to January 1, 1982.

Governing Regulatory Document: NUREG-0737, Item II.K.2.17.

Commitments: Alabama Power Company completed compliance with this license condition based on a Westinghouse Owners Group submittal dated April 20, 1981. However, Alabama Power Company committed to implement plant specific operating procedures to address this issue as part of NUREG-0737, Item I.C.1. Therefore, deletion of this license condition would not affect compliance commitments since they will be based on the to-be-issued 10CFR50.54(f) letter per SECY 82-111.

Request: Since this license condition is dependent on the Westinghouse Owners Group and present commitments are based on the governing regulatory documents, Alabama Power Company requests that this license condition be deleted.

2.C.(21)(i)(2) Reactor Coolant Pump Tripping

License Condition: Submit analyses of small break LOCAs demonstrating whether automatic reactor coolant pump tripping is needed, and if so, complete plant modifications necessary to provide for automatic pump tripping.

Governing Regulatory Document: NUREG-0737, Item II.K.3.5.

Commitments: Alabama Power Company is participating in a Westinghouse Owners Group effort to resolve this issue. The commitments associated with this issue are documented in the Alabama Power Company letter dated December 22, 1981. Deletion of this license condition would not affect these commitments.

Request: Since this license condition is redundant to the governing regulatory document which is being addressed by the Westinghouse Owners Group, Alabama Power Company requests that it be deleted.

2.C.(21)(i)(4) Small Break LOCA Model

License Condition: Submit a revised small break LOCA model by January 1, 1982.

Governing Regulatory Document: NUREG-0737, Item II.K.3.30 and Item II.K.3.31.

Commitments: Alabama Power Company addressed this license condition by submitting a letter dated December 22, 1981, and referencing a Westinghouse letter dated November 25, 1981. This letter stated that Westinghouse committed to revise its small break LOCA model to reduce the existing conservatism in order to address unrelated safety issues such as pressurized thermal shock. In addition, this letter provided a commitment to perform a plant specific analysis after the completion of the generic analysis. Therefore, deletion of this license condition would not affect any previous commitments since they are being handled by the generic efforts of the Westinghouse Owners Group.

Request: Since this license condition is based on the governing regulatory document and the generic efforts of the Westinghouse Owners Group, Alabama Power Company requests that this condition be deleted.

ATTACHMENT 2

Safety Evaluation for Proposed Deletion of Specific License Conditions to the Joseph M. Farley Nuclear Plant - Unit 2 Operating License

I. BACKGROUND

The operating license for the Joseph M. Farley Nuclear Plant - Unit 2 was issued on March 31, 1981, containing several license conditions of which many are related to generic issues such as fire protection (Appendix R), environmental qualification (NUREG-0588) and the TMI action plan (NUREG-0737). At the time the license was issued, the license condition completion dates were based on the schedules in governing generic regulatory documents. However, since issuance of the license, several regulatory changes have occurred affecting both the scope and schedule for these generic issues.

Due to the nature of a license condition, any change in scope or schedule for completion requires an amendment to the operating license. As a result, Alabama Power Company must seek amendments to the license when changes to the schedule for completion of generic license conditions occur, even though the NRC is well aware of and, in some cases, was a party to the revised schedules.

II. REFERENCE

Facility Operating License No. NPF-8 dated March 31, 1981
License Conditions:

- 2.C.(6) Fire Protection
- 2.C.(16) Masonry Walls
- 2.C.(18) Environmental Qualification
- 2.C.(20) Regulatory Guide 1.97, Rev. 2
- 2.C.(21)(a) Emergency Operating Procedures
- 2.C.(21)(b) Reactor Coolant System Vents
- 2.C.(21)(g) Reactor Vessel Level
- 2.C.(21)(h)(1) Analysis of Thermal Mechanical Conditions
- 2.C.(21)(h)(2) Voiding in the Reactor Coolant System
- 2.C.(21)(i)(2) Reactor Coolant Pump Tripping
- 2.C.(21)(i)(4) Small Break LOCA Model

III. BASES

As a result of the regulatory changes associated with the referenced license conditions, many of these conditions are redundant or schedules for resolution exceed the dates included in the license. An effort to correct these license conditions would be considerable. This process would be a nonproductive duplication of effort by both Alabama Power Company and the NRC since the changes would be based on existing generic regulatory documents.

Alabama Power Company respectfully requests that the license conditions referenced above and listed in Attachment 1 be deleted from the Unit 2 operating license. This action would not affect the commitments previously made by Alabama Power Company regarding resolution of these generic issues and they will continue to be resolved per the governing generic regulatory documents such as NUREG-0737 and SECY 82-111. Specific commitments for resolution of each identified license condition and reference to the governing generic regulatory documents are included in Attachment 1. Since this proposed change to the operating license does not modify any previous licensing commitments made by Alabama Power Company, there is no adverse impact on resolution of the outstanding generic issues or on overall plant safety.

IV. CONCLUSION

The proposed deletion of the referenced license conditions does not involve an unreviewed safety question as defined by 10CFR50.59. Additionally, these changes will not affect the safe operation of the Joseph M. Farley Nuclear Plant - Unit 2.