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Alabama Power

the southern electric system

February 1, 1983

Docket Nos. 50-348
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 - Units 1 and 2
Administrative Technical Specification Changes

Gentlemen:

Alabama Power Company has identified several proposed administrative changes that will clarify and correct the Farley Nuclear Plant Technical Specifications and allow for better scheduling of certain surveillance testing. These changes were all identified during routine reviews for accuracy and clarity of the Technical Specifications by Alabama Power Company personnel.

Alabama Power Company's Plant Operations Review Committee has reviewed these proposed changes to the Technical Specifications and has determined that the changes do not involve an unreviewed safety question as shown in Attachment 1. The proposed changes to the Technical Specification pages are included in Attachment 2. The Nuclear Operations Review Board will review these changes at a future meeting.

NRC approval of these proposed changes is requested by September 1, 1983.

This letter is a supplement to the Alabama Power Company letter dated November 16, 1982. The class of this proposed change is designated as Class II for Unit 1 and Class I for Unit 2 according to 10 CFR 170.22 requirements. A check for \$1,600.00 to cover the total amount of fees required was enclosed with the November 16, 1982 letter.

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In accordance with 10 CFR 50.30 (c)(1)(i), three signed originals and forty (40) additional copies of these proposed changes are enclosed.

Yours very truly,



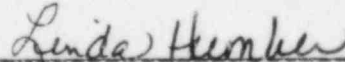
F. L. Clayton, Jr.

FLCJr/GGY:lsh-D32

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 2nd DAY OF February, 1983



Notary Public

My Commission Expires: 1-10-87

ATTACHMENT 1
SAFETY EVALUATION FOR UNIT 1 AND 2
TECHNICAL SPECIFICATION CHANGES

BACKGROUND:

The proposed changes involve:

1. ACTION Statement 20 Error
2. High Energy Line Break Isolation Sensors
3. Fire Detection Instrumentation
4. ECCS Disconnect Devices
5. RHR Isolation and Interlock Action
6. Containment Vent Valve (Unit 1 only)
7. Yard Fire Hydrants and Associated Hydrant Hose Houses
8. Service Water Building Battery Discharge Test
9. Facility Organization
10. Security Plan Audit Frequency
11. Environmental Qualification (Unit 1 only)
12. Augmented Low Power Test Program (Unit 2 only)

These changes are the result of routine reviews for accuracy and clarity of the Technical Specifications for Unit 1 and Unit 2. The specific proposed administrative changes and their bases are discussed below.

REFERENCES:

1. FNP Unit 1 Technical Specifications
2. FNP Unit 2 Technical Specifications

PROPOSED CHANGES:

1. ACTION Statement 20 Error

A review of the accuracy of Table 3.3-3 ACTION statements revealed an error in the text of ACTION statement 20. The interlock for Pressurizer Pressure is P-11 rather than P-4 in the Technical Specifications. This error needs to be corrected to reflect actual plant design and is editorial in nature.

This change affects pages 3/4 3-24 of the Unit 1 and Unit 2 Technical Specifications.

2. High Energy Line Break Isolation Sensors

A review of the accuracy of Table 3.3-10, "High Energy Line Break Isolation Instrumentation," revealed some discrepancies in the descriptions of the sensor locations. Based on a walk-down of the installed sensors, the room and elevation information for the sensors has been corrected to reflect as-built conditions. These changes are administrative since they involve correcting errors in the Technical Specification descriptions.

This change affects pages 3/4 3-54 and 3/4 3-55 of the Unit 1 and Unit 2 Technical Specifications.

3. Fire Detection Instrumentation

A review of the accuracy of Table 3.3-12, "Fire Detection Instrumentation," revealed some discrepancies. Due to on-going design changes to the fire protection system at Farley, smoke detectors have been added in some areas to comply with NRC requirements. The proposed changes to Table 3.3-12 update the Technical Specifications based on an actual walk-down of the installed smoke detectors.

Other changes have been made to more clearly identify detector and alarm room locations. These changes are purely editorial and do not impact on the performance of the Surveillance Requirements or the LCO.

These changes affect pages 3/4 3-60 and 3/4 3-60a of the Unit 1 and Unit 2 Technical Specifications.

4. ECCS Disconnect Devices

In accordance with the requirements of NUREG-0737, Item II.B.2, electrical disconnect devices were installed to preclude having to enter a potentially high radiation area during post-accident conditions in order to unlock and close the breakers to the operators of valves 8808A, 8808B, 8808C, 8884, 8886, 8132A, 8132B and 8889. These breakers are required to be locked open by the Unit 1 and Unit 2 Technical Specifications 4.5.1.1.c and 4.5.2.a. Since the disconnect devices were installed as a licensing requirement to provide safer access to the locked open function, the term "breaker" should be replaced by "disconnect device" to account for the design change. This change is administrative since it involves an NRC approved design required by the Farley Unit 2 Operating License as part of shielding modifications and reflects actual as-built conditions at Unit 1 and Unit 2.

An additional change is needed on page 3/4 5-4 at the bottom of the page for the Unit 2 Technical Specifications. The footnote refers to charging pump 1A (Unit 1 designation). This is an error and should be corrected to refer to charging pump 2A.

This change affects page 3/4 5-2 and 3/4 5-4 of the Unit 1 and Unit 2 Technical Specifications.

5. Verification of RHR System Isolation and Interlock Action

The RHR system automatic isolation and interlock action is verified at least once per 18 months per Surveillance Requirement 4.5.2.d.1. This action occurs at approximately 700 psig (Reactor Coolant System pressure). The current wording in the Surveillance Requirement is that the automatic action will be verified "...when the Reactor Coolant System pressure is above 750 psig." Therefore, the proposed Technical Specification change clarifies the requirement by stating that the automatic action will be verified "...when the Reactor Coolant System pressure is between 700 psig and 750 psig." This change is purely editorial, reflects actual plant design and has no impact on the performance of this Surveillance Requirement.

This change affects page 3/4 5-4 of the Unit 1 and Unit 2 Technical Specifications.

6. Containment Vent Valve

In accordance with the requirements of NUREG-0737, Item II.E.4.2, the Unit 1 18" mini-purge valves are being replaced with 8" vent valves during the current 4th refueling outage. The modified system was required by the Farley Unit 2 Operating License and committed to and described in the Alabama Power Company letters of September 9, 1981, September 23, 1981, and October 30, 1981. 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 October 30, 1981 letter, the modified design complies with the requirements of Branch Technical Position CSB-6-4. This change is administrative since it involves an NRC approved design and reflects as-built conditions at Unit 1.

This change affects page 3/4 6-10 of the Unit 1 Technical Specifications.

7. Yard Fire Hydrants and Associated Hydrant Hose Houses

A review of the accuracy of Table 3.7-7, "Yard Fire Hydrants and Associated Hydrant Hose Houses," revealed some discrepancies. By mistake, two fire hydrants which are designated for Unit 2 use only were listed in the Unit 1 Technical Specifications. Also, a fire hydrant identification number was listed incorrectly in the Unit 2 Technical Specifications. A footnote has been added to both specifications in order to clearly indicate which fire hydrants are shared between Units 1 and 2. These changes are to correct and clarify the Technical Specifications. No change to the Surveillance Requirements or the LCO is involved.

These changes affect page 3/4 7-93 of the Unit 1 Technical Specifications and page 3/4 7-63 of the Unit 2 Technical Specifications.

8. Service Water Building Battery Discharge Test

Every 18 and 60 months, the Service Water Building D.C. Battery System is required to be subjected to a performance discharge test by Surveillance Requirement 4.8.2.6.2.d and 4.8.2.6.2.e. Additionally, the ACTION statement requires that with one train of the D.C. distribution system inoperable, the plant must be shutdown after 8 hours. Since the Service Water Building D.C. Distribution System is common for Farley Units 1 and 2 as described in the FSAR, the discharge test requirement and the ACTION statement would require that both Units 1 and 2 be shutdown during performance of the discharge tests.

The proposed Technical Specification change allows one D.C. distribution train to be inoperable during the battery discharge test. This test could be performed during power operation with the proposed change. This change is administrative in nature since it only involves test scheduling. Currently the next testing required by this specification is due to be completed by August 8, 1983.

This change affects pages 3/4 8-12, 3/4 8-13 and 3/4 8-14 of the Unit 1 Technical Specifications and pages 3/4 8-15, 3/4 8-16 and 3/4 8-17 of the Unit 2 Technical Specifications.

9. Facility Organization

As a result of plant staff organizational changes, the Performance and Planning Group at the Farley Nuclear Plant has been expanded to include a Quality Control Supervisor and a Plant Modifications Supervisor position. The change provides for more efficient utilization of plant staff and supervisory personnel. Also, the Quality Control program has been strengthened.

The proposed change to the Technical Specifications involves correcting Figure 6.2-2, "Facility Organization," to show the Quality Control Supervisor and the Plant Modification Supervisor. This administrative change affects page 6-3 of the Unit 1 and Unit 2 Technical Specifications.

10. Security Plan Audit Frequency

In accordance with the standard Technical Specification guidance on audit frequency for the security plan at Farley Nuclear Plant, the audit frequency is at least once per 24 months; however, 10 CFR 73.55(g)(4) requires an audit at least every 12 months. Since the requirements in the Code of Federal Regulations are binding in this situation, the Unit 1 and 2 Technical Specifications are proposed to be changed to require audits at least once per 12 months. This change is administrative since it involves updating the Technical Specifications to conform to the Code of Federal Regulations.

This change affects page 6-11 of the Unit 1 and Unit 2 Technical Specifications.

11. Environmental Qualification

The Unit 1 Technical Specifications contain Section 6.16 on environmental qualification. This section has been superseded by an interim rule published in the Federal Register on June 30, 1982 (10 CFR 50.49). A final rule has now been approved by the Commission such that the requirements in 6.16 are no longer applicable. The entire section 6.16 should be deleted.

This change affects page 6-27 of the Unit 1 Technical Specifications.

ATTACHMENT 1
SAFETY EVALUATION FOR UNIT 1 AND 2
TECHNICAL SPECIFICATION CHANGES
Page 6

12. Augmented Low Power Test Program

The Unit 2 Technical Specifications contain Section 7.1, "Augumented Low Power Test Program," regarding certain Technical Specification exemptions needed for the low power test program performed in 1981. Since this section is no longer applicable, it should be deleted.

This change affects page 7-1 of the Unit 2 Technical Specifications.

CONCLUSION:

The proposed changes to the Unit 1 and Unit 2 Technical Specifications do not involve an unreviewed safety question as defined by 10 CFR 50.59.

ATTACHMENT 2

Proposed Technical Specification Changes

Unit 1

Pages 3/4 3-24
3/4 3-54
3/4 3-55
3/4 3-60
3/4 3-60a
3/4 5-2
3/4 5-4
3/4 6-10
3/4 7-93
3/4 8-12
3/4 8-13
3/4 8-14
6-3
6-11
6-27

Unit 2

Pages 3/4 3-24
3/4 3-54
3/4 3-55
3/4 3-60
3/4 3-60a
3/4 5-2
3/4 5-4
3/4 7-63
3/4 8-15
3/4 8-16
3/4 8-17
6-3
6-11
7-1