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October 6, 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
Turbine Valve Technical Specification Change Request

Gentlemen:

Alabama Power Company submitted a proposed change to the Farley Nuclear Plant Unit 2 Technical Specifications on October 8, 1982, that requested deletion of the turbine valve testing requirements. Subsequent discussions with the NRC resulted in two appeal meetings, one on March 23, 1983 and the other on August 16, 1983. The conclusion of the August 16, 1983 appeal was that the NRC agreed to approve deletion of specific prescriptive requirements in the Unit 2 turbine overspeed protection technical specification provided Alabama Power Company submits a technical specification change to reference the Farley Nuclear Plant "Turbine Overspeed Reliability Assurance Program." Enclosed is the proposed technical specification to include reference to this program in the Unit 1 and Unit 2 Technical Specifications along with a description of this program for information.

The enclosed Farley Nuclear Plant "Turbine Overspeed Reliability Assurance Program" describes the maintenance, calibration and testing of the turbine overspeed protection system. This program is based on actual operating experience at the Farley Nuclear Power Plant. This comprehensive program is the subject of on-going review and evaluation such that changes in scope and/or schedule may occur as appropriate; however, the objective of maintaining the high reliability of the turbine overspeed protection system will be met. The program and any subsequent changes will be reviewed and approved as specified in existing plant administrative procedures. The program will be performed

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in accordance with procedures, maintenance work requests and/or outage work schedules as appropriate. All deviations from the program and deficiencies identified through the specified maintenance, calibration or testing activities will be evaluated by Alabama Power Company to determine appropriate action to be taken such as correcting the deviation or deficiency, performing compensatory action or removing the turbine from service.

The turbine valve maintenance program includes inspection and maintenance of all throttle and governor valves at least every 39 months and all reheat stop and intercept valves at least every 60 months. These maintenance intervals are substantially more frequent than the current Unit 2 Technical Specification requirement to inspect one of each type of valve at least every 40 months.

The calibration program addresses the turbine overspeed protection system instrumentation. Calibration is performed during each refueling outage or following major maintenance on the turbine/generator or the overspeed protection system.

The testing program addresses the turbine valves and the turbine overspeed protection system. Testing is performed during each turbine startup, unless tested within the previous seven (7) days, including startup after each refueling outage. The testing program includes a complete test of all turbine valves on an approximate interval of four (4) months. Also, the turbine is subjected to an actual overspeed trip test every refueling outage or following major maintenance on the turbine.

The governor, throttle, intercept, and reheat stop valves are in the process of being added to the Nuclear Plant Reliability Data System (NPRDS) in order that deficiencies may be reported and reviewed and appropriate changes may be made in the Farley Nuclear Plant program based on reliability information.

Westinghouse has reviewed the Alabama Power Company "Turbine Overspeed Reliability Assurance Program."

Anticipatory trips of the turbine were discussed during the August 16, 1983 meeting. As a result, the NRC requested an explanation of the generator output breaker initiated turbine trip. This information is contained in WCAP-10161, dated September 1982, which was transmitted to the NRC with Alabama Power Company's letter dated October 8, 1982.

The enclosed proposed technical specification change involves revising Technical Specification 3/4.3.4 regarding "Turbine Overspeed Protection" of the Unit 2 Technical Specifications and adding Technical Specification 3/4.3.4 to the Unit 1 Technical Specification. This change is supplemental to the October 8, 1982 request to delete Unit 2 Technical Specification 3/4.3.4, "Turbine Overspeed Protection."

This proposed change, which includes the October 8, 1982 submittal, does not involve a significant hazards consideration as defined in 10 CFR 50.92. The proposed change which adds reference to the "Turbine Overspeed Reliability Assurance Program" to the Unit 1 Technical Specification is consistent with item (ii) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14870 of the April 6, 1983 issue of the Federal Register, since the change constitutes an additional limitation, restriction, and control not presently included in the technical specifications. The proposed change to revise section 3/4.3.4 of the Unit 2 Technical Specification is consistent with item (vi) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14870 of the April 6, 1983 issue of the Federal Register, since the change may result in some increase to the probability of a previously analyzed accident, but the results of the change are clearly within all acceptable criteria specified in the Standard Review Plan. The Plant Operations Review Committee has reviewed this proposed change. The Nuclear Operations Review Board will review this change at a future meeting.

This proposed technical specification change is a supplement to Alabama Power Company letter dated October 8, 1982. The class of this proposed change is designated as Class III for Unit 2 in accordance with 10 CFR 170.22 requirements and a check for $4,000 to cover the fee required was enclosed with the October 8, 1982 letter. The class of this proposed change is designated as Class I for Unit 1 in accordance with 10 CFR 170.22 requirements and a check for $400 to cover the fee required is enclosed with this letter. NRC approval of this proposed technical specification is requested by November 1, 1983 to support the Unit 2 startup schedule. Unit 2 is scheduled to startup from the 2nd refueling outage on October 24, 1983.

Alabama Power Company requests that Attachment 1 of the enclosure not be released for public disclosure or reproduced. If affidavits are required for withholding the proprietary information from public disclosure in accordance with 10 CFR Section 2.790 of the Commission's rulemaking, Alabama Power Company is requested to be notified before such disclosure.

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

Yours very truly,

F. L. Clayton, Jr.

FLCJr/GGY:ddr-D4
Enclosure
cc: Mr. R. A. Thomas
Mr. G. F. Trowbridge
Mr. J. P. O'Reilly
Mr. E. A. Reeves
Mr. W. H. Bradford
Dr. I. L. Myers

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 6TH DAY OF Oct, 1983

Notary Public

My Commission Expires: 10/27/85