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June 4, 1982

Docket Nos. 50-348  
50-364

Director, Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Mr. D. G. Eisenhut

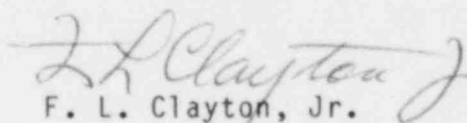
Joseph M. Farley Nuclear Plant - Units 1 and 2  
Post-TMI Requirements (Generic Letter No. 82-10)

Gentlemen:

In response to your letter of May 5, 1982, enclosed is the status of the NUREG-0737 items requiring licensee response.

If you have any questions, please advise.

Yours very truly,

  
F. L. Clayton, Jr.

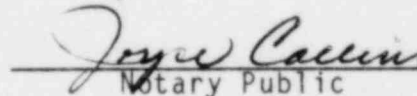
FLCJr/JAR:jc-D13

Enclosure

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

SWORN TO AND SUBSCRIBED  
BEFORE ME THIS 4th  
DAY OF June, 1982.

A046

  
Notary Public

My Commission Expires:

10-27-85

ENCLOSURE

Status of NUREG-0737 Items Requiring Licensee Response

<u>Item</u>	<u>Title</u>	<u>APCo Response</u>
I.A.1.3.1	Limit Overtime: Revise administrative procedures to limit overtime in accordance with NRC Policy Statement issued by Generic Letter No. 82-02, dated February 8, 1982.	Procedures are now in place limiting overtime at the Farley Plant. A revision is scheduled prior to October 1, 1982 to reflect the more current guidance of Generic Letter 82-02 with clarification provided as follows: Generic Letter 82-02 criteria 1-3 are exempted during outages and criterion 4 does not preclude overtime extension to more than one person per shift. By letter dated March 24, 1982, the NRC has completed its review of this TMI action plan item for both units and has found APCo's policy to be acceptable and the requirement closed.
I.A.1.3.2	Minimum Shift Crew: Augment current shift staffing to conform with minimum levels set forth on page 3-9 of NUREG-0737.	Shift staffing at the Farley Nuclear Plant currently complies with and has met the minimum Technical Specification requirements for Unit 2 since Fuel Load. These requirements incorporate provisions of page 3-9 of NUREG-0737. Unit 1 staffing levels were made compatible with Unit 2 on May 1, 1982 when a Technical Specification change (Amendment 26) became effective revising the staffing requirements to reflect the Unit 2 provisions.
I.C.1	Revise Emergency Procedures: Revise procedures by next refueling outages.	As a part of Alabama Power Company's response to NUREG-0578 and NUREG-0737 (TMI Lessons Learned), IE Bulletin 79-06, and the Unit 2 licensing process, the Farley emergency operating procedures were revised to address the applicable TMI issues.

<u>Item</u>	<u>Title</u>	<u>APCo Response</u>
I.C.1 (continued)		Although the schedule for revised emergency procedures promulgated in NUREG-0737 required implementation by the 1st refueling after January 1, 1982, it is understood that the Commissioners are presently considering a revised implementation schedule for this item under the topic of SECY, 82-111, "Requirements for Emergency Response Capabilities." Commission action on this document is anticipated in June 1982. Alabama Power Company will respond to the results of this Commission action when the revised implementation schedule has been published. These subsequent changes are considered by Alabama Power Company to represent only refinements to previously revised emergency procedures.
II.D.1.2	RV & SV Test Program: Submit plant specific reports on relief and safety valve program.	The preliminary evaluation required by Generic Letter 81-36 was submitted by Alabama Power Company on April 1, 1982. The final plant specific report is scheduled to be submitted, as required, by July 1, 1982.
II.D.1.3	Block Valve Test Program: Submit report of results of test program.	Results of the block valve test program are scheduled to be submitted by July 1, 1982.

<u>Item</u>	<u>Title</u>	<u>APCo Response</u>
II.K.3.30 & 31	SB LOCA Analysis: Submit plant specific analyses.	As stated in the Alabama Power Company letter of March 26, 1982 to the NRC, Alabama Power Company is working with Westinghouse and the Westinghouse Owners Group for resolution of this requirement. A final report of the Westinghouse model is scheduled to be submitted to the NRC by July 1, 1982. After staff approval of this model, Alabama Power Company will submit plant specific analyses, as required.
III.A.1.2	Staffing Levels for Emergency Situations: Provide for augmentation of staffing in accordance with Generic Letter 81-10 dated 02-18-81.	Alabama Power Company's letter dated April 6, 1981 addressed the requirements for augmentation as provided in Generic Letter 81-10 dated February 18, 1981. Compliance with Table B-1 of NUREG-0654 is expected in July 1982 with minor variances (shown in Table 1). Such variances are required due to the Farley location affecting time of senior management arrival and time for call in of offsite plant support and Farley specific plant organizational structure.
III.A.1.2	Upgrade Emergency Support Facilities: Complete modifications.	As stated in my letter of May 19, 1981, Alabama Power Company startup offices have been designated as the interim Emergency Operations Facility (EOF) for the Farley Nuclear Plant. These offices are

<u>Item</u>	<u>Title</u>	<u>APCo Response</u>
III.A.1.2 (Continued)		located on the plant site outside the primary security area. Offices are available to accomodate federal, state and local officials. Communications to the plant and offsite organizations are provided. The permanent EOF will be located in the Farley Nuclear Plant Training Center which is presently under construction and is scheduled for completion by October 1, 1982.
III.A.2.2	Meterological Data: Complete modifications.	Modifications are scheduelld to be completed by October 1, 1982 as described in the Alabama Power Company letter dated May 19, 1982.
III.D.3.4	Control Room Habitability: Modify facility as identified by licensee study.	This requirement was closed by the NRC for Unit 2 by the Unit 2 SER #5 (March 1981) page 22.3-23 in which no design modifications were required. The same study that the Unit 2 closure was based upon applies to Unit 1 where design modification also were not required. This status was documented to the NRC in Alabama Power Company letter dated June 26, 1980 and further referenced by Alabama Power Company letter dated December 22, 1981.

TABLE 1 (Continued)

MINIMUM STAFFING REQUIREMENTS FOR NRC LICENSEES  
FOR NUCLEAR POWER PLANT EMERGENCIES

Major Function Area	Major Tasks	Position Title or Expertise	On Shift*	Capability for Additions Within 60 Minutes*****
Protective Actions (In-plant)	Radiation Protection: a. Access Control b. HP Coverage for repair, corrective actions, search and rescue first- aid & firefighting c. Personnel monitoring d. Dosimetry	C&HP Technicians	2	2
Firefighting.	--	--	Fire Brigade per Technical Specifications	Local Support
Rescue Operations and First-Aid	--	--	2**	Local Support
Site Access Control and Personnel Accountability	Security, Firefighting communications, personnel accountability	Security Personnel	All per Security Plan	
		Total	19	15

Notes:

- \*For each unaffected nuclear unit in operation, maintain at least one shift foreman, one control room operator and one auxiliary operator except that units sharing a control room may share a shift foreman if all functions are covered.
- \*\*May be provided by shift personnel assigned other functions.
- \*\*\*Overall direction of facility response to be assumed by EOF director when all centers are fully manned. Direction of minute-to-minute facility operations remains with senior manager in technical support center or control room.
- \*\*\*\*May be performed by engineering aide to shift supervisor.
- \*\*\*\*\*Staffing capability in 60 minutes is dependent upon immediate availability of personnel, time of day, weather conditions, or radiological conditions.

#A senior manager from the Corporate Office will report to the EOF within 4 hours.

TABLE 1

MINIMUM STAFFING REQUIREMENTS FOR NRC LICENSEES  
FOR NUCLEAR POWER PLANT EMERGENCIES

Major Function Area	Major Tasks	Position Title or Expertise	On Shift*	Capability for Additions Within 60 Minutes*****
Plant Operations and Assessment of Operational Aspects		Shift Supervisor (SRO)	1	---
		Shift Foreman (SRO)	1	---
		Control Room Operators	2	---
		Auxiliary Operators	2	---
Emergency Direction and Control (Emergency Director)***		Shift Supervisor or Emergency Director	1**	---
			2	2
Notification/ Communication****	Notify Licensee, State, Local and Federal personnel & maintain com- munication			
	Emergency Opera- tions Facility (EOF) Director Offsite Dose Assessment	Senior Manager†	--	1
Radiological Accident Assessment and Support of Operational Accident Assessment		Senior Health Physics (HP) Expertise	1	---
	Offsite Surveys		2**	2
	Onsite (out-of-plant) In-plant surveys	C&HP Technicians	1	1
	Chemistry/Radio- chemistry	C&HP Technicians	2	1
Plant System Engineering, Repair and Corrective Actions	Technical Support	Shift Technical Advisor	1	---
		Core/Thermal Hydraulics	1	---
		Electrical	--	1
		Mechanical	--	1
	Repair and Correc- tive Actions	Mechanical Maintenance/ Rad Waste Operator	1**	1
		Electrical Maintenance	1	1
		Instrument and Control (I&C) Technician	1	1
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