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August 24, 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
10CFR50.49 - Environmental Qualification

Gentlemen:

In letter dated May 20, 1983, Alabama Power Company requested an exemption to the schedule provided in 10CFR50.49(g) for identifying accident monitoring equipment (Regulatory Guide 1.97) and upgrading its environmental qualification. Alabama Power Company has been subsequently informed by the NRC Farley Nuclear Plant Project Manager, Mr. E. A. Reeves, that such an exemption pursuant to 10CFR50.12 is not required to obtain an extension to the schedule of 10CFR50.49(g). While the request of Alabama Power Company letter dated May 20, 1983 was phrased to obtain an "exemption" pursuant to 10CFR50.12 to the schedule of 10CFR50.49(g), that request was intended to provide an "extension" to the schedule of 10CFR50.49(g). Therefore, Alabama Power Company herein clarifies its request of May 20, 1983 to extend the schedule of 10CFR50.49(g) to November 30, 1985 for accident monitoring equipment only.

As stated in Section B of Alabama Power Company letter dated May 20, 1983, all equipment within the scope of 10CFR50.49 (b)(1) and (b)(2), other than accident monitoring equipment of 10CFR50.49(b)(3), is presently environmentally qualified at Farley Nuclear Plant - Units 1 and 2. The identity of the equipment within the scope of 10CFR50.49(b)(1) and (b)(2) and its qualification is documented in previous Alabama Power Company IEB 79-01B and NUREG-0588 responses. These responses also address the TMI Action Plan equipment and its qualification. All TMI Action Plan equipment is environmentally qualified but the Target Rock solenoid valves at Unit 1 and the

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Victoreen radiation monitors and Target Rock solenoids at Unit 2. Both the Target Rock solenoid valves and Victoreen radiation monitors were installed in order to provide state-of-the-art equipment within the NUREG-0737 implementation date requirements. The qualification reports for the Target Rock solenoids are currently under development by Westinghouse and will be reviewed by Alabama Power Company when issued (currently scheduled for October 1983) to ensure the solenoid valves are qualified to the specific Farley Nuclear Plant accident environment. Based on a review of the test report for Victoreen radiation monitors, Alabama Power Company has identified the need for water-tight sealing of the detector cables/connectors which was installed at Unit 1 during the fourth refueling outage (1st quarter of 1983) and is scheduled to be installed at Unit 2 during the second refueling outage (third quarter of 1983). As discussed in Alabama Power Company letter dated May 20, 1983, the TMI Action Plan equipment is not considered essential to achieve a safe shutdown condition or within the scope of 10CFR50.49, and the schedule for its qualification does not impair the safe shutdown capability of Farley Nuclear Plant - Units 1 and 2. During the review of instrumentation to satisfy R.G. 1.97, certain TMI Action Plan components may be included within the scope of accident monitoring equipment addressed by 10CFR50.49 (B)(3), and the schedule for its qualification will be consistent with that for all other accident monitoring equipment as discussed herein.

Specifically, Section B of Alabama Power Company letter dated May 20, 1983 requested an exemption, pursuant to 10CFR50.12, from the requirements of 10CFR50.49(g) to allow the schedule for identifying accident monitoring equipment (Regulatory Guide 1.97) as described in 10CFR50.49(b)(3) and upgrading its environmental qualification to be in accordance with the Preliminary Farley Emergency Response Capability (ERC) Integrated Implementation Plan and Schedule. This preliminary schedule was submitted in response to the NRC's Generic Letter 82-33 in order to outline the current planning for installation of modifications to enhance the existing and adequate ERC at the Farley Nuclear Plant. These enhancements address Supplement 1 to NUREG-0737, whose basic provisions include Regulatory Guide 1.97. The schedule for the installation of these enhancements, including those addressing Regulatory Guide 1.97, is plant-specific and provides for prompt implementation while optimizing the use of utility and ERC resources.

Regulatory Guide 1.97 includes a provision to upgrade the environmental qualification of accident monitoring instrumentation and will be satisfied upon the installation of enhancements to the ERC system. In letter dated April 15, 1983, Alabama Power Company outlined the basis for the Preliminary Farley ERC Integrated Implementation Plan and Schedule, which addresses Regulatory Guide 1.97 and upgrading the environmental qualification of accident monitoring instrumentation, and discusses the unavailability of information to determine the completion dates of necessary activities such as procurement lead times and installation durations. The Preliminary Farley ERC Integrated Implementation Plan and Schedule will integrate the implementation of the enhancements to

the ERC system to preclude unnecessary procurement and installation problems and potential duplication of modifications which could result from design that does not consider the guidance of all the interrelated NRC regulatory documents. This preliminary schedule does not anticipate the upgrading of environmental qualification of accident monitoring instrumentation, as necessary, to be completed within the schedule provided by 10CFR50.49(g) since this activity is being addressed in Alabama Power Company's efforts regarding Supplement 1 to NUREG-0737. Consequently, Alabama Power Company requests, pursuant to 10CFR50.49(g), that the schedule to identify accident monitoring equipment (Regulatory Guide 1.97) as described in 10CFR50.49(b)(3) and to upgrade its environmental qualification be extended to November 30, 1985 pending a determination by the Commission that the Preliminary Farley ERC Integrated Implementation Plan and Schedule in Alabama Power Company letter dated April 15, 1983 is an appropriate schedule to resolve problems with integrating the design, procurement and installation of the enhancements to the existing ERC system, including accident monitoring instrumentation (Regulatory Guide 1.97).

As stated in Alabama Power Company letter dated April 15, 1983, the provisions of Supplement 1 to NUREG-0737 are to enhance the present emergency response capabilities and are not intended to provide the sole safety function. Currently, the Farley plant computer and main control board are being utilized to monitor plant parameters required during normal and emergency conditions. Alabama Power Company has reviewed the present design of the Farley instrumentation and believes that this present instrumentation design provides an adequate emergency response capability during the implementation of modifications to enhance these capabilities. Consequently, the safe operation of Farley Nuclear Plant Units 1 and 2 will not be jeopardized during the implementation of modifications to enhance the present emergency response capabilities and upgrade its environmental qualification to satisfy Regulatory Guide 1.97 and 10CFR50.49.

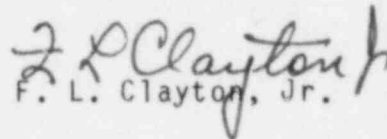
It is requested that this proposed extension to the schedule of 10CFR50.49(g) be provided by October 14, 1983. This requested date is approximately two weeks prior to the return to power from the Unit 2 second refueling outage which is in accordance to the schedule of 10CFR50.49(g) for providing final environmental qualification by the second outage after March 31, 1982. Granting this proposed extension by October 14, 1983 would prevent the unnecessary loss of power generation at Unit 2 resulting from the extended outage to design, procure and install the upgrades for environmental qualification of accident monitoring instrumentation. To complete the upgrades for certain components, the outage could be extended by twelve months.

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If there are any questions regarding this issue, please contact this office.

Yours truly,


F. L. Clayton, Jr.

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