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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
NUREG-0737, Item II.B.3, Post-Accident Sampling System

Gentlemen:

On October 31, 1980 the NRC issued NUREG-0737, "Clarification of TMI Action Plan Requirements," which stated under criteria (10) to Item II.B.3: "Accuracy, range, and sensitivity [of the Post-accident Sampling System] shall be adequate to provide pertinent data to the operator in order to describe radiological and chemical status of the reactor coolant systems."

In March 1981 the NRC issued Supplement No. 5 to the Farley Nuclear Plant Unit 2 Safety Evaluation Report which stated that "Based on our [NRC] review of procedures and design modifications, we conclude that the post-accident sampling system design complies with the requirements of Item II.B.3 and is therefore acceptable." Alabama Power Company therefore, at that time, considered the requirements of NUREG-0737, Item II.B.3 to be complete; however, on July 22, 1982, the NRC Staff developed additional guidelines which, in part, provided the philosophy that the minimum training frequency for use of the post-accident sampling system was every six months.

On April 1, 1983 Alabama Power Company addressed the NRC concerns as provided in the July 22, 1982 NRC letter. In a letter dated December 15, 1983, the NRC subsequently stated that Alabama Power Company's resolution of nine of the eleven criteria was acceptable; however, additional information was requested for the remaining two. This information was provided to the NRC by letter of February 17, 1984. On June 11, 1984 members of the NRC Staff verbally informed Alabama Power Company that its position regarding the July 22, 1982 NRC Staff clarification of NUREG-0737, Item II.B.3 was unacceptable and a commitment for semi-annual training was requested.

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As stated in Alabama Power Company's February 17, 1984 letter to the NRC, calibration of the post-accident sampling system equipment is performed on a periodic basis and the post-accident sampling system is used for routine sampling on a daily basis. The entire post-accident sampling system has been tested during annual emergency drills. In addition, training on the operation of the remote handling apparatus, sampling, analysis and transport is conducted annually in association with the emergency drills. This training is also an integral part of the annual formal requalification training for the chemistry and counting room technicians. The daily routine use of the post-accident sampling system equipment is similar to its design use in a post-accident environment with the exception of the use of simple handling equipment and potential sample dilution. The step by step operation of sample dilution and handling equipment is covered in detail in plant procedures.

Alabama Power Company believes that daily utilization of the equipment for Reactor Coolant System sampling and annual training provide better confidence in the technicians' capability than the current NRC Staff recommendation of a six month training frequency. It is believed that the NRC Staff philosophy on a six month training frequency is based on the fact that most of the nuclear industry post-accident sampling systems, being separate systems, are not utilized on a daily basis. This, as stated above, is not the case for Farley Nuclear Plant. Alabama Power Company considers that the daily utilization of the sampling equipment, combined with annual training, more than meets the intent of the NRC Staff's July 22, 1982 additional clarification to NUREG-0737, Item II.B.3. The most frequent periodicity of any chemistry technician formal training is annual. To modify this frequency for one system would be inconsistent with other previous requirements for chemistry technician training.

It was also requested by the NRC Staff on June 11, 1984 that Alabama Power Company revise its scheduled implementation of the improved Westinghouse calculational methodology to assess the extent of core damage from September 8, 1984 to August 1984. Alabama Power Company hereby commits to implement the improved calculation methodology by the end of August 1984.

If you have any questions, please advise.

Yours very truly,

R. P. McDonald

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cc: Mr. L. B. Long
Mr. J. P. O'Reilly
Mr. E. A. Reeves
Mr. W. H. Bradford