



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

April 25, 1984

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Docket Nos. 50-348  
and 50-364

MEMORANDUM FOR: Darrell G. Eisenhut, Director  
Division of Licensing

THRU: Gus C. Lainas, Assistant Director  
for Operating Reactors Division of Licensing

Steven A. Varga, Chief Operating Reactors Branch #1  
Division of Licensing

FROM: Edward A. Reeves, Project Manager  
Operating Reactors Branch #1 Division of Licensing

SUBJECT: CONFIRMATORY ORDER FOR NUREG-0737 SUPPLEMENT 1  
FARLEY NUCLEAR PLANT UNITS 1 AND 2

In accordance with your July 12, 1983, memorandum relating to Emergency Response Schedules, the attached Confirmatory Order has been completed after extensive negotiations between our staff and Alabama Power Company (APCo) management. Some of the scheduled dates shown in APCo's "Farley ERC Integrated Implementation Schedule" provided by letter dated April 15, 1983, supplemented on August 5, September 22, and December 15, 1983, and April 6, 1984, go beyond December 1985 which was our target completion date. Therefore, a significant background and basis for accepting the later dates shown in the attachment to the order are provided as follows:

1. APCo's management position after consultation with NRC management in November 1981 resulted in a delay of about 13 months while NRC prepared Supplement 1. For the reasons stated in APCo's letter dated November 16, 1981, APCo determined that it should not expend significant funds until the regulatory requirements were finalized. Supplement 1 finalized these requirements in December 1982 and requested a licensee response in April 1983. This was a total delay of about 18 months from November 1981 when APCo decided not to sign the contract to start improvements in the emergency response capability.
2. During these 18 months APCo participated very actively with NRC management and also with the Nuclear Utility Task Action Committee (NUTAC) and the Westinghouse Owners Group to develop an overall integration plan for the NUREG-0737 Supplement 1 provisions. From this work emerged the "Preliminary Farley ERC Integrated Implementation Plan and Schedule" submitted to NRC on April 15, 1983. However, this schedule provided firm dates only for activities scheduled in 1983. Other dates shown were identified as preliminary and only to illustrate the current APCo planning. An order could not be issued without schedule dates.

April 25, 1984

3. for this reason the Project Manager visited the Farley site and APCo corporate headquarters in early May 1983, to review the existing site emergency response capability (ERC) and to discuss further possible improvements in the ERC implementation schedule. APCo's stated goal for ERC implementation at that meeting was three and one-half years. An update schedule was also promised by December 15, 1983.
4. APCo's December 15, 1983 letter focused attention on the SPDS schedule and stated a goal of three and one-half years has been established for implementing a verified and fully operational SPDS. This goal allows for two refueling outages to complete engineering walkdowns, procurement, etc. APCo considers a more realistic schedule would require three refueling outages (RO). Thus, three outages are reflected in APCo's December 15, 1983 schedule for the fully operable SPDS and for completion of operator training with the SPDS. The schedule at that time was: Unit 1 - 8th RO, March 1988; Unit 2 - 5th RO, October 1987; with a goal of 3-1/2 years or October 1986 for both units. I could not support this schedule and informed APCo and NRC management of my concerns.
5. On March 16, 1984, a site visit was held between APCo senior management, NRC management and the NRC Project Manager. We reviewed the site facilities focusing on the existing Farley site emergency response capability. We expressed NRC's concerns about the proposed schedules which continued to reflect completions of March 1988 (Unit 1) and October 1987 (Unit 2). APCo advised us at this meeting that the SPDS purchase letter of intent was just signed. The purchase order contains provisions to ensure factory acceptance of the SPDS is completed by December 18, 1985. On this basis APCo agreed to finalize an SPDS implementation schedule to more closely approach the 3-1/2 year goal.
6. APCo's April 6, 1984 letter provided a schedule improvement until September 1987 for SPDS complete implementation in both units. Other ERC elements will be reflected in APCo's refined schedule now promised in September 1984. On April 19, 1984 APCo advised me that the established goal of three and one-half years from April 15, 1983 is realistic and will be reflected to the extent possible in the September 1984 schedule for all parts of the integrated schedule.

On the basis of the information provided above, I recommend sending the Confirmatory Order as prepared on April 19, 1984.

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Edward A. Reeves, Project Manager  
Operating Reactors Branch #1  
Division of Licensing

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