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Alabama Power
the southern electric system

August 6, 1984

Docket Nos. 50-348
50-364

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

Attention: Mr. S. A. Varga

Farley Nuclear Plant - Units 1 and 2
Appendix R, Basis for Scheduling Exemption

Gentlemen:

As a result of a request by the NRC Staff, Alabama Power Company is providing additional information on the 10CFR50, Appendix R scheduling exemption for the alternative shutdown modification. Alabama Power Company is required by 10CFR50.48 to provide Alternative Shutdown Capability in accordance with 10CFR50, Appendix R for Farley Nuclear Plant, Units 1 and 2, by the end of the sixth and third refueling outages, respectively. By letter dated June 18, 1982, Alabama Power Company requested an exemption until the Unit 1 seventh and Unit 2 fourth refueling outages for completion of the Appendix R alternative shutdown modification. The basis for this scheduling exemption is as follows:

- (1) Final design and procurement activities were initiated upon receipt of NRC approval of the design description by letter dated August 26, 1983.
- (2) In April, 1984, sufficient design for procurement of engineered items was issued and purchase orders initiated. Procurement lead times for some of the equipment (e.g., signal converter cards) are typically on the order of 48 weeks. This is based on the interface requirements with Class IE components requiring design, field fabrication, and seismic testing prior to installation.

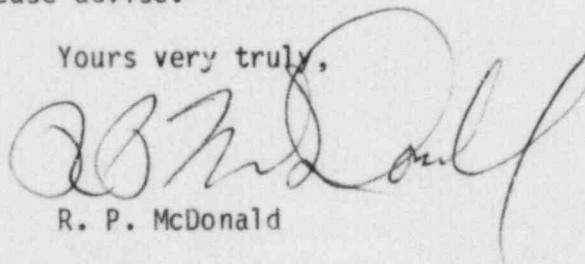
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- (3) Because of NRC additions (i.e., neutron monitor and T_{cold}) to the original Alabama Power Company design description of the alternative shutdown modification, final design time for Unit 1 and 2 has increased from the estimated 8 months described in Alabama Power Company's June 18, 1982 letter to approximately 12 months.
- (4) Detailed installation schedules cannot be established until the issuance of the final design, however, the current installation schedule for work inside containment requiring unit shutdown is estimated at four weeks. This estimate does not include allowance for resolution of field encountered problems that typically occur during the installation of large design changes such as the alternative shutdown modification. This design change requires substantial cable additions, installation of new cable trays both inside and outside of containment, and installation of the neutron monitor in the reactor cavity. The installation, inspection, and verification of the alternative shutdown modification are therefore anticipated to require more than one refueling outage. This is based on Alabama Power Company's planned refueling outage schedule of five weeks for each unit, which allows approximately four weeks inside containment for modifications to the primary systems.

Alabama Power Company believes the above demonstrates need for the schedular exemption requested in referenced letter dated June 18, 1982. If there are any questions, please advise.

Yours very truly,



R. P. McDonald

RPM/DHJ:ddb-D14

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