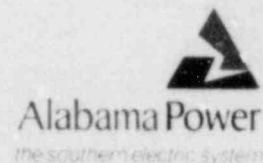


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R. P. McDonald
Senior Vice President
Flintridge Building



September 14, 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

Joseph M. Farley Nuclear Plant - Units 1 and 2
Supplemental Response to Generic Letter 83-43,
Reporting Requirements of 10CFR50.72 and 10CFR50.73

Gentlemen:

Pursuant to NRC letter dated July 25, 1984, this letter and its Attachments form Alabama Power Company's supplemental response to Generic Letter 83-43, dated December 19, 1983. This letter, in conjunction with Alabama Power Company's letters dated February 3 and July 6, 1984 (Item 1 only), forms a complete response to Generic Letter 83-43.

Attachment 1 contains a discussion of each proposed change to the Farley Nuclear Plant - Units 1 and 2 Technical Specifications and provides supporting background information and justifications.

Attachment 2 lists the changed Technical Specification pages and includes the proposed changed pages. The proposed changes do not involve a significant hazards consideration as defined in 10CFR50.92. These changes are similar to example (vii) of "Examples of Amendments That Are Considered Not Likely to Involve Significant Hazards Considerations" listed in 48FR14877 dated April 6, 1983. These changes are similar in that they represent a change to make the Licenses conform to changes in the regulations, where the license changes result in very minor changes to the facilities operations, clearly in keeping with the regulations. Additionally, the proposed changes are in accordance with NRC guidance contained in Generic Letter 83-43.

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Mr. S. A. Varga
U. S. Nuclear Regulatory Commission

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September 14, 1984

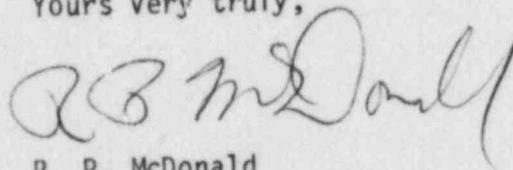
The Plant Operations Review Committee has reviewed this supplement and the Nuclear Operations Review Board will review this supplement at a future meeting. Alabama Power Company requests that the NRC review and approve these proposed changes to the Technical Specifications as soon as practicable in order to eliminate the inconsistency between 10CFR50.72 and 10CFR50.73 and the existing Technical Specifications.

Because the original proposed technical specification change and this supplement are being submitted at the request of the NRC and since Generic Letter 83-43 stated that no license amendment fee is required for changes which implement the Generic Letter, no License Application or Approval fee is enclosed.

In accordance with 10CFR50.90, three (3) signed originals and forty (40) conforming copies of this supplement are enclosed. Pursuant to 10CFR50.91(b), a copy of this letter and its attachments have been provided to Mr. Dan Turner, the designated representative of the State of Alabama.

If you have any questions, please advise.

Yours very truly,

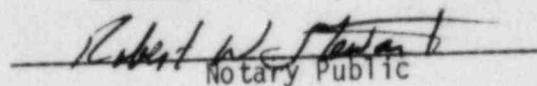


R. P. McDonald

RPM/CJS:ddb-D Tech Spec I
Attachments

cc: Mr. L. B. Long
Mr. J. P. O'Reilly
Mr. E. A. Reeves
Mr. W. H. Bradford
Mr. G. F. Trowbridge
Mr. D. Turner

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 14th DAY OF September 1984


Notary Public

My Commission Expires: 10/27/85

Attachment 1

Proposed Administrative Technical
Specification Changes

1) Change to Technical Specification 3.0.2 (Both Units 1 and 2)

The first sentence has been modified pursuant to 10CFR50.73(a)(2)(i)(B) to clarify when Licensee Event Reports, should be submitted.

2) Change to Technical Specifications:

| | |
|------------------------|----------------------|
| 3.1.1.3, Action a.3 | 3.11.1.3, Action a |
| 3.3.3.9, Action b | 3.11.2.2, Action a |
| 3.7.11.1, Action a;b.2 | 3.11.2.3, Action a |
| 3.7.11.2, Action a | 3.11.2.4, Action a |
| 3.7.11.3, Action a | 3.11.3, Action b |
| 3.7.11.4, Action a | 3.11.4, Action a |
| 3.7.11.5, Action a | 3.12.1, Action a;c |
| 3.7.12, Action a | 3.12.2, Action a;b |
| 3.11.1.2, Action a | (Both Units 1 and 2) |

Delete the phrase ", in lieu of any other report required by Specification 6.9.1,".

The intent of this phrase was to ensure that the Licensee understood that a "Special Report" was different than a "Reportable Occurrence" and that there was not a need to submit 2 reports for the same event. Since there are no longer any "Reportable Occurrences" in Section 6.9.1, this phrase is superfluous and therefore has been deleted from the above mentioned Specifications.

3) Change to Technical Specification 4.2.2.2.e and Bases 3/4.2.2 and 3/4.2.3. (Both Units 1 and 2)

Change the references to Specification 6.9.1.14 to Specification 6.9.1.11. This change is precipitated by the renumbering of the Radial Peak Factor Limit Report Section as a result of deleting the "Reportable Occurrence" sections of Section 6.9.1, pursuant to Generic Letter 83-43.

- 4) Change to Technical Specifications 3.3.3.10, Action "c" and 3.3.3.11, Action "c". (Both Units 1 and 2)

Action "c" has been deleted and Action "d" designated as Action "c". The intent of these action statements was to relieve Licensees and the NRC Staff of writing and reviewing, respectively, comparatively non-significant Reportable Occurrences. Since Reportable Occurrences have been deleted pursuant to Generic Letter 83-43 and 10CFR50.73, these action statements are superfluous and have therefore been deleted.

- 5) Change to Technical Specification 3.4.9, Modes 1, 2, 3, 4 and 5, Action "a" (Both Units 1 and 2)

Delete last two sentences, the first of which begins with "A REPORTABLE OCCURRENCE".

Since Reportable Occurrences have been deleted from the Technical Specifications pursuant to 10CFR50.73 and Generic Letter 83-43, this report has been deleted.

- 6) Change to Technical Specifications 3.5.2, Action "b" and 3.5.3, Action "c" (Both Units 1 and 2)

This reporting requirement is now codified in 10CFR50.73(a)(2)(iv). These action statements have, therefore, been deleted in their entirety.

- 7) Change to Technical Specification 4.6.1.6.4 (Both Units 1 and 2)

This reporting requirement is now codified in 10CFR50.73(a)(2)(ii). This section has, therefore, been deleted in its entirety. In addition, the deletion of this reporting item from the Technical Specifications is consistent with recent NRC approved technical specifications.

- 8) Change to Technical Specification 4.7.10.3 (Both Units 1 and 2)

This section has been deleted in its entirety. This is not a "Special Report" as described in Technical Specification 6.9.2 and Generic Letter 83-43; therefore, it is considered appropriate, in light of the issuance of 10CFR50.73, to remove this reporting requirement from the Technical Specifications.

- 9) Change to Technical Specification 4.8.1.1.3 (Both Units 1 and 2)

This section has been deleted in its entirety. Since this is not a "Special Report" and the Reportable Occurrence section of the Technical Specifications have been deleted, this section has been deleted pursuant to Generic Letter 83-43. In addition, an annual report of the Diesel Generators' reliability has been added to Section 6.9.1.12 of the Technical Specifications pursuant to Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability", dated July 2, 1984.

- 10) Change to Technical Specification Tables 4.11.1, note "g"; 4.11.2, note "h" and 4.12.1, note "c". (Both Units 1 and 2)

The phrase "in lieu of any other report" has been deleted and reference to Technical Specification 6.9.1.8 has been verified to exist in each of the notes. The reason for this change is the same as for Item 2, above.

- 11) Change to Technical Specification 3.12.1, Action "b" (Both Units 1 and 2)

Action "b" has been deleted in its entirety and Actions "c" and "d" have been designated as Actions "b" and "c" respectively. The safety significant aspects of this reporting requirement have been codified in 10CFR50.73(a)(2)(viii)(A) and (B) as well as 10CFR50.73(a)(2)(ix). This is not a "Special Report" and the thirty-day (30) reporting requirements of Section 6.9.1.13 are no longer in effect as a result of the issuance of 10CFR50.73 and Generic Letter 83-43; therefore, this action statement has been deleted. It should be noted that this information will continue to be included in the Annual Radiological Environmental Operating Report pursuant to existing Technical Specification 6.9.1.7.

- 12) Change to Technical Specification Bases 3/4.4.6 (Both Units 1 and 2)

The last paragraph of the page has been modified by deleting the word "promptly" and substituting in the place of "Specification 6.9.1", "10CFR50.73". This change is consistent with the guidance provided in Generic Letter 83-43 and supplements the same change made in Technical Specification 4.4.6.5(c) in Alabama Power Company letter dated July 6, 1984.

- 13) Change to Appendix B, Section 4.1 (Both Units 1 and 2)

The first paragraph has been modified to conform to the requirements of the newly issued 10CFR50.72.