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**Alabama Power**  
the southern electric system

November 26, 1984

Docket No. 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 recent communications with the NRC Staff, this letter supplements Alabama Power Company's September 14, 1984 letter which proposed changes to the Farley Nuclear Plant Technical Specifications Sections 3, 4 and 6 and the Bases of Section 3/4 to implement the new reporting requirements of 10CFR50.72 and 10CFR50.73 (LER Rule).

This supplement reflects the final technical specification changes necessary to implement the new LER Rule and includes the comments of the NRC Staff. Each of the changes resulting from discussions with the NRC Staff is provided in Attachment 1.

In order to facilitate the issuance of the proposed technical specification change which implements the new LER Rule, all the proposed changed pages from the February 3, July 6 (Item 1 only), and September 14 technical specification change requests and this supplement have been compiled and are provided in Attachment 2. It should be noted, that page 6-21 of Attachment 2 reflects not only the page number change as a result of the new LER Rule, but also a change to technical specification 6.10.2.n which was included in the July 6, 1984 proposed technical specification change for deleting the snubber tables. Currently the snubber technical specification change is scheduled to be completed by the NRC Staff prior to this LER Rule technical specification change; therefore, in order to ensure that the correct page is issued, the snubber technical specification change is included in page 6-21 of Attachment 2.

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

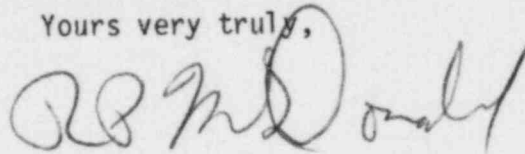
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Alabama Power Company requests that the NRC review and approve these proposed changes to the Technical Specifications by January 21, 1985 in order to eliminate the inconsistency between the new LER Rule and the existing technical specifications.

Because the original proposed technical specification change of September 14, 1984 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 Fee is enclosed.

If you have any questions, please advise.

Yours very truly,



R. P. McDonald

RPM/CJS:ddb-D-Tech Spec II  
Attachments

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

## Attachment 1

- 1) Change to Technical Specification 3.4.9, Modes 1, 2, 3, 4 and 5 Action "a" (Both Units 1 and 2). This change was identified as item 5 in Attachment 1 of the September 14, 1984 Alabama Power Company submittal.

In the September 14, 1984 submittal, Alabama Power Company proposed to delete Reportable Occurrence submittals from Technical Specification Sections 3 and 4, pursuant to 10CFR50.73 and Generic Letter 83-43. The NRC Staff stated during recent telephone conversations that an annual report would be required in lieu of the current Reportable Occurrence, if the reactor coolant specific activity limit of 1.0 microcurie/gram or 100/E were exceeded. An annual reactor coolant system specific activity report is included in Attachment 2 as a new Technical Specification 6.9.1.13 (page 6-20 both units). This proposal is consistent with the most recent revision of the Westinghouse Standard Technical Specifications.

- 2) Change to Technical Specifications 3.5.2, Action "b" and 3.5.3, Action "c" (both Units 1 and 2). This change was identified as item 6 in Attachment 1 of the September 14, 1984 Alabama Power Company submittal.

In the September 14, 1984 submittal, Alabama Power Company proposed to delete submittals which were already required to be reported pursuant to 10CFR50.73. During recent telephone conversations, the NRC Staff stated that certain information which is not specifically included in the applicable 10CFR50.73 provisions is necessary for NRC evaluation; therefore, a Special Report would be required in the event of an ECCS actuation. Alabama Power Company hereby withdraws the proposed changes to Technical Specification 3.5.2 and 3.5.3 which were included in the September 14, 1984 letter.

- 3) Change to Technical Specification 4.7.10.3 (both Units 1 and 2). This change was identified as item 8 in Attachment 1 of the September 14, 1984 Alabama Power Company submittal.

In the September 14, 1984 submittal, Alabama Power Company proposed to delete technical specification reports which were no longer required pursuant to 10CFR50.73. Since a record of all sealed source and fission detector leak tests and results, as well as a record of annual physical inventory of all sealed source material of record, are required to be maintained for NRC audit for a minimum of 5 years (Technical Specification 6.10.1) and since the stated purpose of the LER Rule was to reduce unnecessary reporting, Alabama Power Company proposed that Technical Specification 4.7.10.3 be deleted.

The NRC Staff stated during recent telephone conversations that an annual seal source leakage report will continue to be required in the Technical Specifications. An annual sealed source leakage report is included in Attachment 2 as a new Technical Specification 6.9.1.14 (page 6-20 for both units).

- 4) Change to Technical Specification 3.12.1, action "b" (both Units 1 and 2). This change was identified as item 11 in Attachment 1 of the September 14, 1984 Alabama Power Company submittal.

In the September 14, 1984 submittal, Alabama Power Company proposed to delete action "b" in its entirety. Subsequent communications with the NRC Staff have indicated that the NRC would prefer that the action statement be modified to require a Special Report rather than delete it in its entirety. Alabama Power Company has revised page 3/4 12-1 for both units to reflect the requirement for a Special Report.

- 5) In the September 14, 1984 submittal, Alabama Power Company proposed to add a new Annual Diesel Generator Reliability Data Report pursuant to Generic Letter 84-15. The NRC Staff stated during recent telephone conversations that the annual report description should be clarified to ensure that the information identified in section C.3.b of Regulatory Guide 1.108 Revision 1, 1977 is provided in the Annual Diesel Generator Reliability Report.

The requested clarification has been included in Attachment 2 (page 6-19 both units). This proposed change is consistent with the reporting information requirement of the existing Technical Specifications.