

Mailing Address
Alabama Power Company
600 North 18th Street
Post Office Box 2641
Birmingham, Alabama 35291
Telephone 205 783-6090

R. P. McDonald
Senior Vice President
Flintridge Building



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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
Fire Protection Upgrade Response to 10CFR50.48
and 10CFR50, Appendix R Requirements

Gentlemen:

Alabama Power Company submitted a plan and schedule for compliance with 10CFR50, Appendix R, III.G.1 and III.G.2 in letter dated June 19, 1982. The schedule indicated that compliance with these sections of Appendix R would be achieved by the end of the Unit 1 fifth and Unit 2 second refueling outages.

On October 19, 1983, Generic Letter 83-33 was issued requesting licensees to reevaluate all Appendix R exemptions for detail of specificity and verification that all exemptions had been properly submitted. A meeting was held with NRC Region II Staff on January 12, 1984 to discuss NRC interpretations of Generic Letter 83-33 and Alabama Power Company was advised that a regional workshop would be conducted by the NRC to provide additional clarifications to Appendix R. By letter dated February 10, 1984, Alabama Power Company committed to a detailed review of the Farley Nuclear Plant fire protection design to determine the affect of the new NRC Appendix R interpretations issued by Generic Letter 83-33. By this letter, Alabama Power Company stated that any additional requests for exemptions were scheduled to be submitted to the NRC by August 1984. On February 13, 1984, I.E. Notice 84-09 was issued and on March 7, 1984 it was supplemented by Revision 1 which provided additional clarification of Appendix R interpretations as a result of NRC inspections at several plants. On May 4, 1984, a workshop was conducted by the NRC in Atlanta, Georgia to provide additional guidance for interpretation of Appendix R, Generic Letter 83-33 and I.E. Notice 84-09. As a result, a detailed program for reanalysis of the fire protection program at Farley Nuclear Plant was not able to be initiated

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until after the workshop based upon the clarifications provided at the workshop. This program included a room by room walkdown of both units to determine any deviations from the revised NRC Appendix R interpretations. On August 28, 1984, Alabama Power Company submitted a letter to the NRC that rescheduled the submittal of any additional exemption requests until December 1984. This rescheduled date was based upon a larger scope of analysis resulting from the walkdown, than was originally anticipated on February 10, 1984.

Approximately 15,300 engineering manhours including approximately 4,000 manhours of overtime have been expended through November, 1984 on the review of the Farley Nuclear Plant fire protection design to determine the affect of the NRC interpretations of Appendix R. It is estimated that completion of the review and preparation of the exemption requests will require an additional 12,000 engineering manhours.

The Appendix R review requires familiarity with the plant fire protection system, and intimate knowledge of the plant electrical drawings and circuit and raceway schedule. Due to this the use of non-project support personnel has not been feasible. In addition to Appendix R, the design organization has expended significant manpower in 1984 on other dated licensing commitments. For example, approximately 4,700 engineering manhours have been expended on the System Parameter Display System (SPDS) modifications, the design of modifications to meet the requirements of Regulatory Guide 1.97, and the design of a Reactor Vessel Level System.

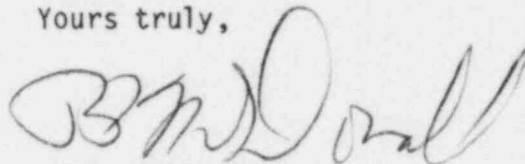
Parallel with these efforts, Alabama Power Company is pursuing completion of the installation of an Alternative Shutdown System in both units prior to the scheduled commitment date. With the exception of the indication of T_{cold}, which will be part of the Reactor Vessel Level System, the Alternative Shutdown Capability is expected to be operational in both units by the end of the Unit 2 third and Unit 1 sixth refueling outages (scheduled to start in early January and mid-April respectively).

As a result, Alabama Power Company will not complete the Appendix R review for compliance with Generic Letter 83-33 and I.E. Notice 84-09 in time to submit the exemptions as scheduled. The exemption requests for all systems shared by both units and for all systems in Unit 2 are currently scheduled to be submitted by the end of February, 1985. All exemption requests for Unit 1 systems will be submitted in May, 1985.

Although the reanalysis has not been completed, some additional exemptions from, and modifications for compliance with Appendix R interpretations have been identified. All modifications that have been identified to date are presently scheduled to be implemented during the upcoming Unit 2 third and Unit 1 sixth refueling outages. Any additional modifications identified prior to the end of the upcoming Unit 2 third or Unit 1 sixth refueling outages that can be designed, procured, packaged and installed prior to the end of these outages will be installed during these outages. Any additional modifications identified that can be performed at power will be implemented during a nonoutage work period following the upcoming outages. Any other modifications will be completed during the first outage of sufficient duration but no later than the Unit 2 fourth and the Unit 1 seventh refueling outages. A schedular exemption pursuant to 10CFR50.12 will be requested for any modification not physically completed when exemptions are submitted in February, 1985 for all shared systems and Unit 2 and in May, 1985 for Unit 1.

If there are any questions, please advise.

Yours truly,



R. P. McDonald

RPM/DHJ:grs-Tech Spec II
cc: Mr. L. B. Long
Mr. J. P. O'Reilly
Mr. E. A. Reeves
Mr. W. H. Bradford