



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

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50-364

FEB 28 1991

MEMORANDUM FOR: Gus C. Lainas, A/D for Region II Reactors, NRR
FROM: Luis A. Reyes, Director, Division of Reactor Projects
SUBJECT: REQUEST FOR ASSISTANCE INVOLVING INTERPRETATION OF
OPERABILITY INVOLVING FARLEY 2 TECHNICAL SPECIFICATION
3.8.1.1 AND 3.0.5 (TIA NO. 91-01)

Farley 2 removed the 2A containment spray pump from service for approximately 4 1/2 hours on January 18, 1991, with the reactor in Mode 1 while the emergency diesel generator (2B) that feeds the B train of emergency core cooling was out of service for its annual maintenance inspection and other maintenance activities. As a result, the A train of containment spray was inoperable and the B train of containment spray was degraded in that it would not have been able to operate during a loss of offsite power.

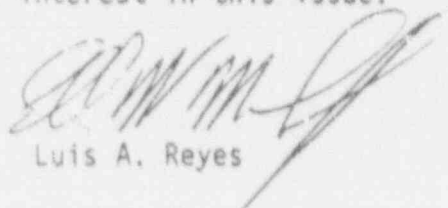
When questioned the General Manager stated that it was not Alabama Power Company's policy to perform surveillance or maintenance on equipment fed from the opposite train during a period that one of the emergency diesel generator sets is out of service, however, he stated that this was not a violation of the Technical Specifications, since a footnote (**) to T.S. 3.8.1.1 permits scheduled maintenance up to 10 days on the diesel generator before the DG must be declared inoperable, and T.S. 3.0.5 permits a system to be considered operable if it is powered from either the normal power source or emergency power. If all the specified conditions are not met action must be initiated in two hours to place the reactor in hot standby within the next 6 hours, etc.

Region II considers the above action to be non-conservative, in that we believe the "** footnote" to mean that the testing to verify operability of the redundant D/G is not required during the first 10 days of a D/G outage initiated to perform TS required surveillance/scheduled maintenance.

Considering the above, please provide the following information:

1. What is the purpose of the ** footnote to TS 3.8.1.1?
2. Is the licensee's interpretation of the ** footnote correct?

We request your response within 30 days since the Region II Regional Administrator has expressed a personal interest in this issue.


Luis A. Reyes

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