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Alabama Power
the southern electric system

Docket Nos. 50-348
50-364

October 24, 1984

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

Joseph M. Farley Nuclear Plant - Units 1 and 2
Inservice Testing of Accumulator and RWST Check Valves

Dear Mr. Varga:

A detailed evaluation has been completed of the inservice testing of the accumulator and RWST check valves. The details of this evaluation were presented to the NRC Staff during a conference call held Tuesday, October 16, 1984.

Alabama Power Company has further reviewed the NRC Staff's position presented during this conference call and proposes to disassemble and inspect the RWST check valve and one accumulator check valve on each unit during the Unit 2 third refueling outage and the Unit 1 sixth refueling outage.

Evaluations are being conducted on the feasibility of performing an accumulator blowdown test at reduced pressure which would be shown to be bounding for accident conditions and which would be consistent with the fuel, reactor vessel, and attendant component integrity requirements. The test would demonstrate that the performance of essential system parameters is sufficient to assure that an equivalent flow to that required in an accident situation would be achieved. This would be an accceptable alternative to disassembly and full stroke inspection under Section XI of the ASME Code (Article IWV-3520) which states that "Confirmation that the disk moves away from the seat shall be by... observation of substantially free flow through the valve as indicated by appropriate pressure indications in the system, or by other positive means... if the test is made by use of fluid flow

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through the valve, the pressure differential for equivalent flow shall be no greater than that observed during the preoperational test." Based on a positive feasibility evaluation of the reduced pressure flow test, described above, justification of such testing would be provided to the NRC for comments prior to implementation.

Alabama Power Company's letter of June 1, 1984 described a proposed RWST check valve test. Evaluations of the feasibility of performing such a test to stroke this valve to the maximum position required to fulfill its design function are continuing.

Alabama Power Company is therefore continuing to pursue the ASME Section XI "equivalent flow" concept quoted above which permits the inservice testing of these valves to be performed by either flow test or valve disassembly.

Based on discussions with the NRC staff, it is understood that NRC is finalizing its position on the inservice testing of these valves and is preparing to issue a letter prior to the start of the next refueling outage. Therefore, it is requested that this letter reflect the commitments discussed above to inspect these valves during the third refueling outage of Unit 2 and the sixth refueling outage of Unit 1, but continue to evaluate "equivalent flow" testing.

Upon completion of these evaluations, and determination of implementation schedules, Alabama Power Company will advise NRC of its intent to implement the proposed alternative methods.

Yours truly,

R. P. McDonald

RPM/STB:drs/D-345
cc/Att: Mr. L. B. Long
Mr. J. P. O'Reilly
Mr. E. A. Reeves
Mr. W. H. Bradford