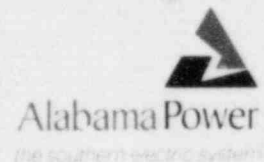


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February 14, 1984

Mr. Harold R. Denton  
Director, Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Document Control Desk

Comments on Recommendations Made By The  
Fire Protection Policy Steering Committee

Alabama Power Company submits the following comments on the recommendations of the Fire Protection Policy Steering Committee as requested by the NRC Staff.

To expedite Appendix R compliance and assure consistent levels of fire protection safety at all plants, the Steering Committee has recommended that extensions to the 10CFR50.48 (c) schedules no longer be granted. Alabama Power Company does not concur with this recommendation. The evolutionary nature of the NRC Staff clarifications and interpretations of the provisions of Appendix R to 10CFR50 have increased the scope of the work necessary to comply with Appendix R and licensees should, therefore, be permitted commensurable schedular relief to complete any additional modifications.

A review of the clarifications issued by the NRC Staff on Appendix R is useful in recognizing the complexity and evolutionary nature of the fire protection issue. NRC Generic Letter 83-33, which was issued on October 19, 1983, requested licensees to reevaluate all Appendix R exemptions to ensure they provided the newly clarified level of specificity and also to reverify that all exemptions had been properly submitted in accordance with the revised exemption policy. I.E. Notice 84-09 dated February 13, 1984, supplemented by Revision 1 dated March 7, 1984, was issued providing additional clarifications of Appendix R based upon NRC inspections at several plants. On May 4, 1984, a workshop was conducted by the NRC in Atlanta, Georgia to provide additional guidance for the proper interpretation of Appendix R, Generic Letter 83-33 and I.E. Notice 84-09 by licensees. In addition, further clarifications are currently being finalized by the NRC Staff as part of the Steering Committee recommendations.

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It is the opinion of Alabama Power Company that extensions to the 10CFR50.48(c) schedules are appropriate since the NRC will not finalize what constitutes "compliance" with the provisions of Appendix R to 10CFR50 until issuance of the generic letter recommended by the Steering Committee report.

In regard to the inspection program, Alabama Power Company does not agree with the Steering Committee's recommendation of using contractor personnel as inspection team members. It is felt that contractor's opinions may become biased if future contracts may result.

In addition, Section C of the generic letter on fire protection states that all calculations supporting any evaluations should be available and all assumptions clearly stated. Alabama Power Company does not routinely maintain design calculations onsite and feels it is unreasonable to require such documentation at the plant site. While sufficient basis for the evaluation results will be available at the plant, design calculations and detailed documentation supporting evaluations should be located at the design organizations.

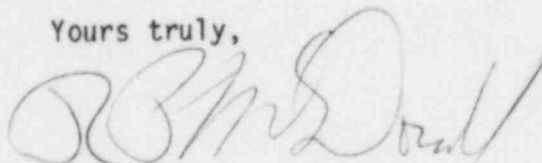
Therefore, Alabama Power Company has the following comments regarding the recommendations of the Fire Protection Policy Steering Committee:

- 1) The schedular recommendation of no extensions to 10CFR50.48(c) should not be adopted,
- 2) Contractor personnel should not be included as an inspection team member, and
- 3) Calculations and detailed design documentation supporting evaluations should not be required to be available at the plant site.

It is requested that consideration be given to licensees based upon the significant changes in Appendix R interpretations made by the NRC Staff.

If there are any questions, please advise.

Yours truly,



R. P. McDonald

RPM/DHJ:gri-D19  
cc: Mr. L. B. Long  
Mr. J. P. O'Reilly  
Mr. E. A. Reeves  
Mr. W. H. Bradford