DISTRIBUTION
Docket File
L PDR
ORB#1 RDG
DEisenhut
EJordan
PMcKee
EReeves
NRC PDR
Gray File
CParrish
OELD
ACRS 10
JPartlow

Docket Nos. 50-348
and 50-364

November 30, 1984

Mr. R. P. McDonald
Senior Vice President
Alabama Power Company
P. O. Box 2641
Birmingham, Alabama 35291

Dear Mr. McDonald:

SUBJECT: NUREG-0737 ITEM.II.F.2, INADEQUATE CORE COOLING INSTRUMENTATION-(GENERIC LETTER 82-28) - JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2

Your responses to the subject TMI action item provided by Alabama Power Company (APCo) letters dated May 11, July 6, and October 8, 1984 have been reviewed. The responses were in response to our request contained in our April 2, 1984 letter requesting you to initiate the necessary actions to implement procurement and installation of an Inadequate Core Cooling Instrumentation (ICCI) system and to provide a schedule and additional information within thirty days.

We have completed our review of your responses including the December 10, 1982, response to our Generic Letter No. 82-28. APCo's position on the CE Heated Junction Thermocouple Inventory Tracking System (ITS) is considered to be unacceptable because of the late projected completion schedule of March 1988 and October 1987 for Units 1 and 2, respectively. These schedules were based on a total of three refueling outages for completing the design and installation. However, in your October 8, 1984 submittal you indicated that selection of the Technology for Energy Corporation (TEC) system could result in an implementation schedule of two outages per unit. This would result in completion of installation by October 1986 and May 1986 for Units 1 and 2, respectively.

The NRC staff has recently reviewed the test data for the TEC system which were presented in support of the Arkansas Power & Light proposed design for ANO-1 and ANO-2. We have concluded that the test data demonstrates the "proof of principle" for the design concept. Therefore, selection of the TEC design concept by APCo would be acceptable to the staff. Likewise, selection of the alternate CE Heated Junction Thermocouple System would be acceptable. In either case, approval of the design concept does not relieve APCo of the responsibility for a viable final design and implementation schedule which remains subject to staff approval.

The APCo proposal for completion of installation within three refueling outages is not consistent with the Commission approved, NRC staff recommendations regarding implementation of TMI Action Plan II.F.2 (NUREG-0737) requirements.

We are in the process of renegotiating a practical schedule for implementation of the required additional instrumentation and upgrading of existing ICC instrumentation for each operating reactor. Installation and instrumentation upgrading is required during the earliest refueling shutdown consistent with the existing status of the plant and practical design and procurement considerations. Your propsed schedule for the ITS installation in three refueling outages is inconsistent with industry practice and the projected completion dates are inconsistent with the staff's commitment to the Commission.

Our information indicates that about 50 percent of the licensees will have systems installed and functional by the end of 1984. Approximately 70 percent of the licensees will have operable systems by the end of 1985. Since the Farley plant is scheduled beyond 1985 you should improve the schedules to the extent practical. We intend to issue additional orders, if needed, to assure that all plants have installed ITS systems in place by 1986.

The arguments invoked by APCo for the delay of the installation are:

1. that such installation "was not practicable until resolution of problems regarding their design, installation and operation had been complete and until such a system was determined operationally acceptable by the NRC" and

2. that the work schedule associated with design, maintenance and licensing activities is a difficult problem.

The NRC staff has reviewed these arguments and finds them lacking in substance to justify the three outage installation delay relevant to the Commission approved recommendations.

We conclude that the three-outage installation schedule is dominated by convenience and cost considerations and you have failed to assign an appropriate safety priority to this requirement. Since the three refueling outage schedule for the ITS installation is not consistent with the Commission approved NRC staff recommendations and the staff does not have the flexibility to approve such delays based on the justification provided, we will require APCo to complete the installation of an approved Inventory Tracking System concept prior to startup after the seventh refueling outage for Unit 1 and the fourth refueling outage for Unit 2. APCo has stated the schedule for these outages to be September 12 to October 27, 1986 for Unit 1, and April 4 to May 19, 1986 for Unit 2. We would find these schedules acceptable.

On the basis of the information cited above and pursuant to 10 CFR 50.54(f), you are requested to provide a written response under oath or affirmation within 30 days of receipt of this letter stating your intentions and completion schedules relative to this matter. Your response will be used by the staff in determining whether to modify or suspend your license.

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents, therefore, OMB clearance is not required under P.L. 96-511.

Frank Miraglia/for

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

*SEE PREVIOUS WHITE FOR CONCURRENCE

ORB#1:DL	C-ORB#1:DL*	AD/CPS:DSI	D:DSI *	OELD *
EReeves/ts	SVarga	LRubenstein	RBernaro	
11/29/84	11/29/84	11/29/84	11/ /84	11/ /84

AD:ORB:DL	D:DL
GLainas	DEisenhut
11/29/84	11/30/84

On the basis of the information cited above and pursuant to 10 CFR 50.54(f), your requested to provide a response within 30 days of receipt of this letter stating your intentions and completion schedules relative to this matter.

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents, therefore, OMB clearance is not required under P.L. 96-511.

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

ORB#1:DL	C-ORB#1:DL	AD/CPS:DSI	D:DSI	OELD
EReeves/ts	SVarga	LRubenstein	RBernero	
11/6/84	11/ /84	11/8/84	11/13/84	11/19/84
AD:OR:DL	D:DL			
GLainas	DEisenhut			
11/ /84	11/ /84			

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

November 30, 1984

Docket Nos. 50-348
and 50-364

Mr. R. P. McDonald
Senior Vice President
Alabama Power Company
P. O. Box 2641
Birmingham, Alabama 35291

Dear Mr. McDonald:

SUBJECT: NUREG-0737 ITEM.II.F.2, INADEQUATE CORE COOLING INSTRUMENTATION-(GENERIC LETTER 82-28) - JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2

Your responses to the subject TMI action item provided by Alabama Power Company (APCo) letters dated May 11, July 6, and October 8, 1984 have been reviewed. The responses were in response to our request contained in our April 2, 1984 letter requesting you to initiate the necessary actions to implement procurement and installation of an Inadequate Core Cooling Instrumentation (ICCI) system and to provide a schedule and additional information within thirty days.

We have completed our review of your responses including the December 10, 1982, response to our Generic Letter No. 82-28. APCo's position on the CE Heated Junction Thermocouple Inventory Tracking System (ITS) is considered to be unacceptable because of the late projected completion schedule of March 1988 and October 1987 for Units 1 and 2, respectively. These schedules were based on a total of three refueling outages for completing the design and installation. However, in your October 8, 1984 submittal you indicated that selection of the Technology for Energy Corporation (TEC) system could result in an implementation schedule of two outages per unit. This would result in completion of installation by October 1986 and May 1986 for Units 1 and 2, respectively.

The NRC staff has recently reviewed the test data for the TEC system which were presented in support of the Arkansas Power & Light proposed design for ANO-1 and ANO-2. We have concluded that the test data demonstrates the "proof of principle" for the design concept. Therefore, selection of the TEC design concept by APCo would be acceptable to the staff. Likewise, selection of the alternate CE Heated Junction Thermocouple System would be acceptable. In either case, approval of the design concept does not relieve APCo of the responsibility for a viable final design and implementation schedule which remains subject to staff approval.

The APCo proposal for completion of installation within three refueling outages is not consistent with the Commission approved, NRC staff recommendations regarding implementation of TMI Action Plan II.F.2 (NUREG-0737) requirements.

DUPE

We are in the process of renegotiating a practical schedule for implementation of the required additional instrumentation and upgrading of existing ICC instrumentation for each operating reactor. Installation and instrumentation upgrading is required during the earliest refueling shutdown consistent with the existing status of the plant and practical design and procurement considerations. Your propsed schedule for the ITS installation in three refueling outages is inconsistent with industry practice and the projected completion dates are inconsistent with the staff's commitment to the Commission.

Our information indicates that about 50 percent of the licensees will have systems installed and functional by the end of 1984. Approximately 70 percent of the licensees will have operable systems by the end of 1985. Since the Farley plant is scheduled beyond 1985 you should improve the schedules to the extent practical. We intend to issue additional orders, if needed, to assure that all plants have installed ITS systems in place by 1986.

The arguments invoked by APCo for the delay of the installation are:

1. that such installation "was not practicable until resolution of problems regarding their design, installation and operation had been complete and until such a system was determined operationally acceptable by the NRC" and

2. that the work schedule associated with design, maintenance and licensing activities is a difficult problem.

The NRC staff has reviewed these arguments and finds them lacking in substance to justify the three outage installation delay relevant to the Commission approved recommendations.

We conclude that the three-outage installation schedule is dominated by convenience and cost considerations and you have failed to assign an appropriate safety priority to this requirement. Since the three refueling outage schedule for the ITS installation is not consistent with the Commission approved NRC staff recommendations and the staff does not have the flexibility to approve such delays based on the justification provided, we will require APCo to complete the installation of an approved Inventory Tracking System concept prior to startup after the seventh refueling outage for Unit 1 and the fourth refueling outage for Unit 2. APCo has stated the schedule for these outages to be September 12 to October 27, 1986 for Unit 1, and April 4 to May 19, 1986 for Unit 2. We would find these schedules acceptable.

On the basis of the information cited above and pursuant to 10 CFR 50.54(f), you are requested to provide a written response under oath or affirmation within 30 days of receipt of this letter stating your intentions and completion schedules relative to this matter. Your response will be used by the staff in determining whether to modify or suspend your license.

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents, therefore, OMB clearance is not required under P.L. 96-511.

Frank J. Miraglia

for Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Mr. R. P. McDonald
Alabama Power Company

Joseph M. Farley Nuclear Plant
Units 1 and 2

cc: Mr. W. O. Whitt
Executive Vice President
Alabama Power Company
Post Office Box 2641
Birmingham, Alabama 35291

Mr. Louis B. Long, General Manager
Southern Company Services, Inc.
Post Office Box 2625
Birmingham, Alabama 35202

Houston County Commission
Dothan, Alabama 36301

George F. Trowbridge, Esquire
Shaw, Pittman, Potts and Trowbridge
1800 M Street, N.W.
Washington, DC 20036

Chairman
Houston County Commission
Dothan, Alabama 36301

Robert A. Buettner, Esquire
Balch, Bingham, Baker, Hawthorne,
Williams and Ward
Post Office Box 306
Birmingham, Alabama 35201

Resident Inspector
U.S. Nuclear Regulatory Commission
Post Office Box 24 - Route 2
Columbia, Alabama 36319

State Department of Public Health
ATTN: State Health Officer
State Office Building
Montgomery, Alabama 36104

Regional Radiation Representative
EPA Region IV
345 Courtland Street, N.E.
Atlanta, GA 30308

D. Biard MacGuineas, Esquire
Volpe, Boskey and Lyons
918 16th Street, N.W.
Washington, DC 20006

Charles R. Lowman
Alabama Electric Corporation
Post Office Box 550
Andalusia, Alabama 36420

James P. O'Reilly
Regional Administrator - Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, GA 30303

Ira L. Myers, M.D.
State Health Officer
State Department of Public Health
State Office Building
Montgomery, Alabama 36130