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Docket Nos. 50-348
and 50-364

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THRU: Gus C. Lainas, Assistant Director
for Operating Reactors, DL

Steven A. Varga, Chief
Operating Reactors Branch #1, DL

FROM: Edward A. Reeves, Project Manager
Operating Reactors Branch #1, DL

SUBJECT: DRAFT OF THE NRR INPUT FOR THE SYSTEMATIC ASSESSMENT OF
LICENSEE PERFORMANCE (SALP) FOR ALABAMA POWER COMPANY'S
(APCo) FARLEY PLANT UNITS 1 AND 2 AUGUST 1, 1983 TO
DECEMBER 31, 1984

Enclosed is a draft of the NRR input to the SALP review for the Joseph M. Farley Nuclear Plant Units 1 and 2. This draft report is based partly upon input solicited from selected staff personnel who have had substantial contact and involvement with APCo licensing material. Please review the draft evaluation and provide any comments you feel appropriate. All comments received by January 18, 1985 will be considered in the final report. Your comments may be provided verbally due to the short turnaround time.

/s/EReeves

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Edward A. Reeves, Project Manager
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Enclosure:
As stated

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
January 15, 1985

Docket Nos. 50-348
and 50-364

FACILITY: Joseph M. Farley Nuclear Plant Units 1 and 2
LICENSEE: Alabama Power Company
EVALUATION PERIOD: August 1, 1983 to December 31, 1984
PROJECT MANAGER: Edward A. Reeves

I. INTRODUCTION

This report contains NRR's input to the SALP review for the Farley Nuclear Plant Units 1 and 2. The assessment of the licensee's performance was conducted according to NRR Office Letter No. 44, NRR Inputs to SALP Process, dated January 3, 1984. This Office Letter incorporates NRC Manual Chapter 0516, Systematic Assessment of Licensee Performance.

II. SUMMARY

NRC Manual Chapter 0516 specifies that each functional area evaluated will be assigned a performance category (Category 1, 2 or 3) based on a composite of a number of attributes. The single final rating to be tempered with judgment as to the significance of the industrial elements.

Based on this approach, the performance of Alabama Power Company in the functional area - Licensing Activities - is rated Category 1.

III. CRITERIA

The evaluation criteria used in this assessment are given in NRC Manual Chapter 0516 Appendix, Table 1, Evaluation Criteria with Attributes for Assessment of Licensee Performance.

IV. METHODOLOGY

This evaluation represents the integrated inputs of the Operating Reactor Project Manager (ORPM) and those technical reviewers who expended significant amounts of effort on the Joseph M. Farley Nuclear Plant Units 1 and 2 licensing actions during the current rating period. Using the guidelines of NRC Manual Chapter 0516, the ORPM and each reviewer applied specific evaluation criteria to the relevant licensee performance attributes, as delineated in Chapter 0516, and assigned an overall rating category (1, 2 or 3) to each attribute. The reviewers included this information as part of each Safety Evaluation Report input transmitted to the Division of Licensing. The ORPM, after reviewing the SALP inputs of the technical reviewers, combined this information with his own assessment of licensee performance and, using appropriate weighting factors, arrived at a composite rating for the licensee. A written evaluation was then prepared

by the ORPM and circulated to NRR management for comments which, if provided, were incorporated in the final draft.

The basis for this appraisal was the licensee's performance in support of licensing actions that were either completed during the SALP period or had a significant level of activity during the SALP rating period. A total of 116 active actions were in review at the beginning of the rating period. NRR completed 124 actions during the period. However, other items were added for review by the licensee and by the NRC staff during the period. Thus, 85 active licensing actions are in review at the end of the report period. A reduction in backlog of 31 was attained during the period. The actions and a partial list of completions consisting of amendment requests, exemption requests, responses to generic letters, TMI items, and licensee initiated actions are:

Multi-Plant Actions (18 complete, 39 in review). Some of the completed actions in this category are:

- ° Control of Heavy Loads - Phase 1 (C-10)
- ° Blocking SI Signal During Cooldown (B-32)
- ° Auto Actuation of Shunt Trip (B-82)
- ° Environmental Qualification of Electrical Equipment (B-60)
- ° Alternate Shutdown System Design Review - Appendix R (B-41)
- ° Masonry Walls (IEB 80-11 and B-59) -- Unit 1
- ° NUREG-0737 Technical Specifications - Generic Letter 82-16 (B-72)
- ° NUREG-0737 Technical Specifications - Generic Letter 83-37 (B-83)

Plant Specific Actions (89 complete, 27 in review). Some of the completed actions in this category are:

- ° IST Relief for Check Valve Tests Granted
- ° ISI Additional Reliefs Granted
- ° Fire Protection - Appendix R Changes in Technical Specifications
- ° Use of Two Assistant Plant Managers in Technical Specifications
- ° Senior Vice President Change to Technical Specifications
- ° Deletion of Turbine Overspeed Valve Tests from Technical Specifications
- ° Deletion of River Water System and Change DG Loads from Technical Specifications

- ° Change to Emergency Preparedness Audit (GL 82-17)
- ° Update Charcoal Filter Tests in Technical Specifications
- ° Removal of Snubber Tables from Technical Specifications (GL 84-13)
- ° Fuel Enrichment Technical Specifications
- ° Upgrade Meteorological Tower Technical Specifications
- ° Four One-time Technical Specification Changes (Three precluded shutdowns)
- ° New PIV Leakage Criteria Technical Specifications
- ° Delete 8-hour Work Day from Technical Specifications

TMI (NUREG-0737) Actions (17 complete 19 in review). Some of the completed actions in this category are:

- ° II.B.1 RCS High Point Vents
- ° II.B.2 Plant Shielding Modifications
- ° II.B.3 Post Accident Sampling
- ° I.D.1 Control Room Design Review (Partial)
- ° II.K.2.17 Potential Voids in the RCS

V. ASSESSMENT OF PERFORMANCE ATTRIBUTES

The licensee's performance evaluation is based on a consideration of four of the seven attributes specified in NRC Manual Chapter 0516. These are:

- Management Involvement and Control in Assuring Quality
- Approach to Resolution of Technical Issues from a Safety Standpoint
- Responsiveness to NRC Initiatives
- Staffing

For the remaining three attributes (enforcement, reportable events, and training and qualification effectiveness), no basis exists for an NRR evaluation for the functional area of Licensing Activities.

A. Management Involvement and Control in Assuring Quality

As we noted in our previous assessment licensee management has continued to assure quality performance in the area of licensing activities. Corporate management has also shown a keen awareness of operating performance as evidenced by the appointment of the Senior Vice President for nuclear

matters and by the dividing of Plant Manager responsibilities for Operations and Administration into two separate management positions. Farley Unit No. 2 has continued to evidence superior operational quality performance as evidenced by a cumulative capacity factor of approximately 84 percent (net) for the first three operating cycles including the first two refueling outages. The third operating cycle for Unit No. 2 will conclude January 4, 1985 shortly after the end of this evaluation period.

Changes to 10 CFR 50.91 made effective May 6, 1983 pursuant to Public Law 97-415 has required the licensee to provide an analysis and a determination of significant hazards considerations with each request for license amendment. The Commission is also required to make the determination and to prenotice each license amendment under consideration. During the period since the change to 10 CFR 50.91 became effective up through this report period 62 licensee requests were noticed, 50 license amendments were issued, and no public comments were received.

Licensee planning and prioritizing of requests for license amendment has continued to improve. We held several meetings with licensee management early in the report period to obtain a mutual understanding of priorities and schedules to enable both licensee staff and Commission staff to utilize resources in a more effective manner. On the basis of this action significant improvements were realized as evidenced by the reduction in licensing backlog even with the increase in number of licensee requests in 1984. We consider the licensee's continued cooperation in the periodic review meetings for all licensing actions in 1984 has been excellent. Thus, improved licensee management attention to scheduling and prioritizing of licensee requests for Commission staff actions has been demonstrated. As shown in the attached "Supporting Data and Summary" many safety related reviews were completed, including the 49 license amendment issued on a mutually acceptable schedule without impacting the Farley site operation.

An example of specific licensing actions where the licensee's close management involvement was evidenced was in the Environmental Qualification of Electrical Equipment. The submittal included well stated, controlled and explicit procedures for the control of equipment qualification activities. It is also significant that all the electrical equipment important to safety at Farley site is qualified. No additional detailed Justifications for Continued Operation is required.

On the basis of these observations, a rating of 1 is assigned to this attribute.

B. Approach to Resolution of Technical Issues from a Safety Standpoint

The increased interaction of the licensee with the NRC staff, including frequent visits and management discussions/meetings, have resulted in clear understanding of safety issues and sound technical approaches are being taken by the licensee's technical staff toward their resolution. Conservatism is being exhibited in relation to significant safety issues on a routine basis. Thoroughness in the approach to the technical issues has been demonstrated by the number and complexity of the licensing actions completed during this period as discussed above.

Consistently sound technical justification has been provided by the licensee for deviations from staff guidance. In the case of the turbine overspeed protection issue, the licensee continued to discuss the issue with the Commission staff including a Division Director's Appeal of the Farley Unit No. 2 surveillance requirements. The result of discussions of the licensee's program of valve and overspeed control maintenance was a license amendment adding a limiting condition of operation to the Unit No. 1 Technical Specifications to agree with Unit No. 2 Technical Specifications and deleting restrictive valve surveillance for Unit No. 2. Thus, that technical issue was resolved from a safety standpoint. The day to day communications between the licensee and NRC staff has also been beneficial to both organizations in the processing of licensing actions and minimizing the need for additional information.

On the basis of these observations, a rating of 1 is assigned to this attribute.

C. Responsiveness to NRC Initiatives

The initial submittals and responses to our requests for information consistently meet the projected schedules or a sound justification and a revised schedule were provided. The corporate structure of the licensee, as with other licensee organizations, requires internal coordination and a cooperative attitude to achieve timely resolution of safety issues in the licensing area. The attitude of the licensee's technical staff's in responding to our requests concerning safety issues has consistently helped in our achieving timely resolutions of safety issues in the licensing area.

We are aware of the extensive licensee efforts and resources currently involved in implementing the NRC requirements relating to NUREG-0737, Supplement 1, Appendix R, and other Commission actions. Individually, each of the requirements are a subset of the total safety effort. Over-emphasis or expenditure of resources in one specific area could possibly result in the overall safety of the plant being degraded. Although this has not been a problem for this rating period, it is pointed out to emphasize the need for continuing to establish the relative safety priorities and to integrate all safety activities in the plant schedules so that there will be a common basis for understanding constraints, needs and priorities. Thus, revised schedules, e.g.'s the licensee's November 30, 1984 revised NUREG-0737 Supplement 1 schedule will require that a discussion of the priority, impact and integration with all ongoing safety efforts be included in the justification. We are currently evaluating the November 30, 1984 schedule which now includes the proposed reactor vessel level instrumentation, a matter of concern to the NRC staff. Resolution of this issue will be reflected in the next SALP report.

On the basis of these observations, a rating of 1 is assigned to this attribute.

D. Enforcement

No basis exists for an NRR evaluation of this attribute.

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On the basis of these observations, a rating of 1 is assigned to this attribute.

E. Reportable Events

No basis exists for an NRR evaluation of this attribute. However, we have noted a significant decrease in licensee event reports in 1984 compared to 1983. The decrease is primarily attributable to Commission changes in the Licensee Event Report System described in Generic Letter 83-43 dated December 19, 1983 and 10 CFR 50.73, effective January 1, 1984.

F. Staffing

The licensee has continued to maintain an adequate licensing staff as reflected in the timely responses and in the quality of the submittals relating to licensing actions. In addition, the senior management changes, including the Senior Vice President position and the two Assistant Plant Managers, should enhance the quality and timeliness of the licensee's submittals.

On the basis of these observations, a rating of 1 is assigned to this attribute.

G. Training and Qualification Effectiveness

No basis exists for an NRR evaluation of this attribute.

VI. CONCLUSION

A complete performance rating of 1 has been assigned by NRR for the SALP evaluation for the current rating period.

INFORMATION TO BE ADDED TO
SECTION V OF THE SALP REPORT
"SUPPORTING DATA AND SUMMARY"

JOSEPH M. FARLEY

1. NRR/Licensee Meetings

Division Director's Appeal Meeting on Turbine Valves	08/16/83
Licensing Amendment Schedule Reviews	11/16/83, 12/13/83, 03/8/84
Movable Control Rod Surveillance Time	01/20/84
Detailed Control Room Design Review	07/25/84

2. NRR Site Visits/Meetings

Project Manager visit on SPDS Schedule	11/8-9/83
SALP Meeting at APCo Headquarters	11/10/83
NUREG-0737 Schedule Review	03/15-16/84

3. Commission Briefings

None

4. Schedular Extensions Granted

Unit 1 & 2 ISI Reliefs for Vessel Cladding	08/24/83
Unit 2 ISI Cladding, RCS Welds and Safe-ends (one outage)	09/09/83
Unit 2 EQ Extension until 03/31/85	10/21/83
Unit 1 EQ Extension until 11/30/85	04/16/84

5. Reliefs Granted

Inservice Inspection:

Unit 2 Initial Reliefs (44 for Class 1, 2, & 3)	09/22/83
Unit 1 Additional Reliefs (13 for Class 1, 2, & 3)	2/10/84
Unit 1 One-time Reliefs for SG Hydro Tests	03/30/84
Unit 2 Charging Pump Welds and SG Hydro Reliefs	12/18/84

Inservice Testing:

Unit 2 RHR pump dp and pump valves	09/16/83
Units 1 & 2 Modifies prior PIV Test Criteria	01/26/84
Units 1 & 2 Check Valve Test Criteria	11/15/84

6. Exemptions Granted

Appendix R, Containment, Sections III.G.2	12/30/83
Appendix R, Alternate Shutdown Schedule	10/04/84
Appendix A, 10 CFR 20 Credit for Radioiodine Factor	10/23/84

7. Licensing Amendments Issued (Total 49)

<u>Amendment Numbers</u>	<u>Title</u>	<u>Date</u>
32/24	River Water Sys. Tests During Plant Operation	08/02/83
--/25	One-time Leak Criteria for PIV's	09/08/83
33/26	Admin., EQ audits & fire protection	10/14/83
34/--	One-time Sump Level Outage Time	10/14/83
35/--	One-time Visual Snubbers Check Extension	10/31/83
36/--	One-time to Allow 74% Movable Incores	11/01/83
37/27	Positive MTC for Low Power	12/30/83
38/28	Overtime Limits Tech Specs per GL 82-12	12/30/83
39/29	EP Audit per GL 82-17	01/06/84
40/30	Change for MPA B-32	01/09/84
--/31	Delete eight hydraulic snubbers	01/10/84
41/32	Deleted Turbine Overspeed Testing	01/27/84
42/33	Fire Protection Corrections	02/09/84
43/--	Snubber Table Changes	02/29/84
--/34	Overcurrent Protection; Snubbers & Vent Valve Changes	05/17/84
44/35	Extends outage allowance for control rods	06/06/84
45/36	Deletes River Water System/Changes DG loads	06/07/84
46/37	Updates Charcoal Filter Testing	06/22/84
47/38	Adds Tech Specs per GL 83-37 & Supp. 1	09/12/84
48/39	Corrects Errors & Changes Title of Chem. Supervisor	09/21/84
49/40	Upgrades Meteorological Tower Instr.	10/04/84
50/41	New PIV Leak Criteria	10/15/84
51/42	Aux. Feed System Tests Without Shutdown	10/17/84
52/43	Fuel Enrichment	11/09/84
53/44	Senior VP Change	11/13/84
54/45	Two Assistant Plant Managers	11/27/84
55/46	Remove Snubber Tables (GL 84-13) & other Admin.	12/19/84
56/47	Delete 8-hour Work Day	12/26/84

8. Emergency Technical Specifications Issued

<u>Amendment Numbers</u>	<u>Title</u>	<u>Date</u>
--/36	Accepted Core Flux Map	11/01/83

9. Orders Issued

Confirmatory Order - Implementation of Supplement 1 to NUREG 037 Items (Response to Gen. Ltr. 82-33)	06/12/84
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10. NRR/Licensee Management Conferences

No formal conferences were held; however, several discussions were held with licensee management to assure appropriate priority and resources are being expended to meet changing safety needs.