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Senior Vice President



Alabama Power  
*the southern electric system*

February 15, 1988

Docket Nos. 50-348  
50-364

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

Gentlemen:

Joseph M. Farley Nuclear Plant - Units 1 and 2  
Integrated Schedules for Plant Modifications

Alabama Power Company has reviewed the proposed policy statement, "Integrated Schedules for Implementation of Plant Modifications" contained in Volume 52, No. 228 of the Federal Register dated November 27, 1987. As discussed in our June 28, 1985 response to Generic Letter 85-07, Alabama Power Company does not feel an integrated schedule license amendment would accelerate or enhance the effort to complete licensing activities.

A five-year integrated schedule is utilized by Alabama Power Company as an aid in scheduling various plant work activities. The five-year integrated schedule was first provided to the NRC in January 1985 as part of the reactor vessel level review. Major license and design modifications, maintenance, license submittals and inspection activities are included and the schedule is updated approximately annually. A more detailed and dynamic scheduling and planning process is used for activities scheduled to occur within a two year timeframe.

Alabama Power Company agrees with the NRC concept of scheduling new licensing items in an integrated fashion in lieu of developing independent schedules for each item. Consequently, Alabama Power Company encourages the concept presented in the proposed policy whereby the NRC Staff evaluates the plant specific schedules for NRC required activities considering all pertinent ongoing activities, their relative priorities, and utility resource constraints.

If a license condition for integrated schedules was imposed, or a formal integrated scheduling plan was submitted to the NRC, additional NRC and Alabama Power Company manpower and time would be required each time the schedule was modified. The adoption of these methods would not, in the opinion of Alabama Power Company, accelerate the completion of licensing activities.

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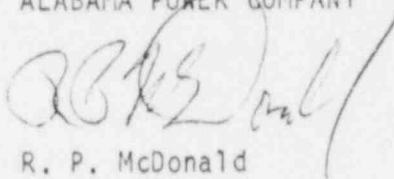
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Alabama Power Company desires to work with the NRC Staff to ensure that licensing activities are integrated with other work activities and completed in a timely manner. The existing working relationship between Alabama Power Company and the NRC Staff, which has been effective to date, will meet the basic objectives of the proposed policy statement without the imposition of unnecessary administrative burdens on the NRC Staff or the licensee.

If there are any questions, please advise.

Respectfully submitted,

ALABAMA POWER COMPANY

A handwritten signature in dark ink, appearing to read "R. P. McDonald", is written over the typed name. The signature is fluid and cursive.

R. P. McDonald

RPM/JLO:dst-TS1

cc: Mr. L. B. Long  
Dr. J. N. Grace  
Mr. E. A. Reeves  
Mr. W. H. Bradford