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Alabama Power
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August 2, 1988

Docket Nos. 50-348
50-364

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

Gentlemen:

Joseph M. Farley Nuclear Plant Units 1 and 2
NRC Inspection Report Nos. 50-348/88-04 and 50-364/88-04

By letter dated June 8, 1988, the NRC forwarded the results of the Systematic Assessment of Licensee Performance (SALP) Board evaluation of Farley Nuclear Plant for 1988. Alabama Power Company has reviewed this report and provides comments in an attachment to this letter.

Alabama Power Company appreciates the opportunity to provide comments on the SALP report and requests that these comments be considered in the NRC's final conclusion. In addition to the attached comments, Alabama Power Company requests that comments and discussions from the July 7, 1988 meeting be taken into consideration for final disposition of the SALP report.

If you have any questions, please advise.

Respectfully submitted,

W. G. Hairston, III

WGH,III/BHW:dst-V8.3

Attachments

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

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No.	Reference	Comment
1.	Page 12, 2nd ¶ (Section IV.B.1)	This paragraph contains several factual errors in regard to steam generator and secondary side chemical treatment: The report states, "Since this sludge had already initiated tube denting, ..." Sludge has not been shown to cause tube denting. Crevice hideout and the resultant crevice pH and corrosion cause denting. Boric acid soaks and online addition was preventatively initiated on Unit 1 due to support plate crevice corrosion (a precursor of denting). The same treatment was initiated on Unit 2 due to stress corrosion cracking occurring at support plate intersections (nondenting related). Tube deformation has not been substantiated at FNP1 or FNP2 (approximately 8 tubes in 2A steam generator have questionable indications. The other tubes are not in question). Neither FNP unit has had a problem with eddy current test probe passage due to restrictions which would be caused by denting. The report states that the addition of boric acid "complicated the pH control needed to prevent general corrosion and pipe thinning." Boron decreases secondary pH slightly but does not cause pH control problems. The report states, "Consequently, the licensee planned to take two major steps to provide additional protection to the steam generators. ...beginning in the next fuel cycles, morpholine will be substituted for ammonia for pH control in an effort to maintain higher pH conditions in the carbon steel piping." The decision to add morpholine was not based on inadequate or complicated pH control but rather on the reduction of erosion/corrosion and of steam generator sludge loading that would be provided by using morpholine as a secondary pH elevating additive.

No.	Reference	Comment
2.	Page 12, 2nd ¶ (Section IV.B.1)	Morpholine has been added at 4-10 ppm, not substituted for ammonia, in Unit 2 Cycle 6 and Unit 1 Cycle 9. Note that ammonia from decomposition of hydrazine is the dominant determinant in steam generator pH control.
3.	Page 15 2nd ¶ (Section IV.C.1)	The deviation for failure to control clams in service water is not indicative of the progress that has been made since August 1, 1986. Extensive testing during the SALP period has resulted in the development of an effective methodology which is environmentally acceptable.
4.	Page 26, 2nd ¶ (Section IV.I.1)	In discussing problems identified in environmental qualification and procurement control, the report states, "The licensee has been slow to acknowledge and correct some of these problems." APCo disagrees with this conclusion. Where it could be demonstrated that problems existed, APCo's corrective action was taken in a timely manner. It would appear that APCo's efforts to explore inspection findings as to their validity has been interpreted as slow acknowledgment and corrective action.
5.	Page 26, 4th ¶ (Section IV.I.1)	The report states, "In January 1988, the proposal to install a vent on the 2B charging pump suction line was canceled." No proposal was canceled. A design change was voided as a result of concerns over the adequacy of the proposed design to vent the accumulated hydrogen and the fact that operational practices had been adopted to prevent adverse affects to the 2B pump. The report further states, "The licensee had been aware of this problem since 1979 but had not instituted permanent corrective action other than running or venting the pump." Contrary to this assertion, APCo was not aware of the total problem since 1979. This incorrect perception on the part of the Staff was discussed at length in the enforcement conference.

No.	Reference	Comment
6.	Page 32, 1st & 2nd ¶ (Section IV.L.1)	The report draws conclusions regarding the environmental qualification program which APCo disagrees with. Whereas the SALP is not an appropriate forum to thoroughly discuss the difference of opinions on environmental qualification, the following concerns are highlighted: 1. The report states that inspections found the environmental qualification program to be marginal during the early development stages. To the contrary, correspondence and the NRC SER seem to indicate the environmental qualification program was satisfactory in the early development stages. 2. The report states that inadequate staffing was a contributor to environmental qualification deficiencies. APCo does not agree that inadequate staffing was provided. 3. The report cites "extensive use of unqualified terminal blocks in instrument circuits inside containment". The issue on terminal blocks has been thoroughly discussed. APCo has maintained the blocks were qualified but the issue regarding instrument inaccuracy could not be resolved until the blocks were replaced with qualified splices. 4. It is inappropriate to cite the issue of upgrade of equipment qualification in accordance with 10 CFR 50.49(1) in the SALP report. This issue resulted from misunderstanding and miscommunication on behalf of both APCo and the NRC. It is not indicative of a programmatic breakdown in engineering support.