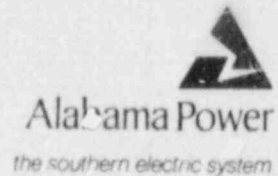


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October 6, 1988

Docket No. 50-348

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

Gentlemen:

Joseph M. Farley Nuclear Plant - Unit 1
Response to Generic SER on Resolution
of Unresolved Safety Issue A-46

On July 29, 1988, the NRC Staff issued a Safety Evaluation Report (SER) on Revision 0 of the Generic Implementation Procedure (GIP) developed by the Seismic Qualification Utility Group (SQUG). The letter to SQUG enclosing the SER requests that SQUG member utilities provide to the NRC, within 60 days, a schedule for implementing the GIP. By letter dated August 19, 1988 to Mr. Shao, SQUG clarified that the sixty days would expire on October 7, 1988. This letter responds to the NRC's request.

According to the generic schedule submitted by SQUG in its October 9, 1987 letter, the final revision of the GIP was to be completed by the end of calendar 1988, followed by NRC review in the first quarter of 1989; however, given the delay in issuing the SER for Revision 0 of the GIP, this objective is probably no longer achievable. Completion of the final revision of the GIP in the first quarter of 1989 is dependent upon: (1) satisfactory and timely resolution of all outstanding issues, (2) accomplishment of all interim milestones as set forth in the generic schedule and (3) continued agreement between SQUG and NRC on major technical and licensing issues.

As the SER acknowledges, the GIP is not yet complete. Several technical areas have not yet been fully included in the GIP. Moreover, the SER does not resolve certain licensing issues central to completion of the GIP raised in Part 1 of Revision 0. Alabama Power Company will not be in a position to establish the scope of its USI A-46 commitment until the GIP is completed and all licensing issues resolved. Given the magnitude of the effort required to achieve resolution of USI A-46, final implementation must be carefully integrated into outage schedules. Assuming the GIP is completed during the first quarter of 1989 and a final SER with no open items or significant change in work scope is issued in the second quarter

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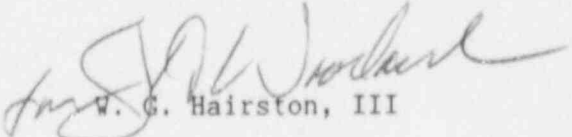
of 1989, the plant walkdown associated with the resolution of this issue can be undertaken by the conclusion of the Unit 1 tenth refueling outage (i.e., second refueling outage after the final SER is issued and open items resolved). This outage will commence on or about March 8, 1991. This schedule may be contingent upon the availability of limited industry resources for which many licensees will be competing. Identification of safe shutdown equipment and other tasks necessary to prepare for the walkdown will be accomplished prior to this outage. If the schedule for GIP development and NRC review slips further, the walkdown and other activities would have to be delayed.

Alabama Power Company will review the final GIP after approval by the NRC and resolution of all outstanding issues. Based on this review, Alabama Power Company will either continue to pursue a generic resolution of USI A-46 or file a plant-specific response. Should the generic resolution be pursued, Alabama Power Company may, at its option, elect not to perform certain aspects of the generic program based upon suitable justification. As stated in our previous letter, Alabama Power Company also reserves the right to contest the Staff's backfitting analysis associated with USI A-46.

If you have any questions, please advise.

Respectfully submitted,

ALABAMA POWER COMPANY



W. G. Hairston, III

WGH,III/BHW:dst-V8.44

cc: Mr. L. B. Long
Dr. J. N. Grace
Mr. E. A. Reeves
Mr. G. F. Maxwell