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Alabama Power

the southern electric system

10CFR50.54(f)

R. P. McDonald
Senior Vice President

February 5, 1987

Docket Nos. 50-348
50-364

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

Attn: Mr. L. S. Rubenstein

Gentlemen:

Joseph M. Farley Nuclear Plant - Units 1 and 2
Completion of NUREG ITEM II.D.1 Review

By letter of December 16, 1986, the NRC stated that the postulated overstress condition of the safety valve discharge piping during certain plant transients was of concern. In addition, it was noted that the emergency and faulted load combinations for the downstream piping did not meet ANSI B31.1 requirements. Also, it was requested that the safety valves be inspected after each lift involving loop seal or water discharge and a formal procedure requiring inspection and maintenance be developed and incorporated into plant operating procedures. A target implementation date has been requested by the NRC for Alabama Power Company's resolution of the above concerns.

Alabama Power Company's original position on the safety valve discharge piping issue, as stated in its November 4, 1982 submittal to the NRC, resulted from engineering judgement based on the results of the analysis performed. This position concluded that the integrity and operability of the safety valves would not be jeopardized. As stated in the December 16, 1986 letter, the NRC is concerned that should the discharge piping not rupture, but become severely deformed, the operability of the safety valves would be affected. The NRC has not substantiated the postulated intact deformation of the discharge piping by analysis. Recognizing that the NRC concern must be addressed, Alabama Power Company must determine whether an additional detailed analysis can be cost justified or whether plant modifications will be required to resolve this issue.

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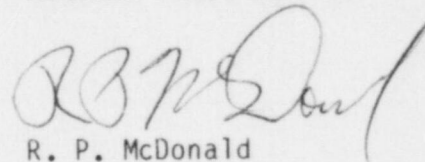
Since additional analysis is expensive, plant modifications may, in some cases, be more cost beneficial. Feasibility studies will thus be required in which the additional analysis and modification conceptual designs are developed and evaluated. In order to develop these conceptual designs, walkdowns of the plant will be required during the next refueling outages for each unit. Upon completion of these walkdowns and feasibility studies, Alabama Power Company will advise the NRC of their results and the schedule for resolution of the NRC concerns on this issue.

For the purpose of updating the Safety Issue Management System for MPA F-14, a target implementation date will be provided at the February 1987 site meeting with the NRC Farley Project Manager. In addition, Alabama Power Company is reviewing the inspection and maintenance requirements associated with the safety valves and will respond to this issue upon completion of the above mentioned walkdowns and feasibility studies.

If there are any questions, please advise.

Respectfully submitted,

ALABAMA POWER COMPANY



R. P. McDonald

RPM/JAR:dst-T.S.6

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