

ALABAMA POWER COMPANY
600 North 10th Street
Tomball, Texas 77480
Telephone (713) 261-1000

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Alabama Power

F. L. CLAYTON JR.

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June 22 1979

Docket No. 50-348
NRC IE Bulletins Nos.
79-06A and 06A Rev. 1

Mr. James P. O'Reilly
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W.
Suite 3100
Atlanta, Georgia 30302

Dear Mr. O'Reilly:

Alabama Power Company has prepared the enclosed responses to items 2, 3, 6, 7, 8, and 12 from the NRC "Evaluation of Licensee's Responses to IE Bulletins 79-06A and 79-06A Revision 1", dated June 7, 1979.

If you have any questions, please advise.

Yours very truly,

F. L. Clayton, Jr.

FLCJr/KAP:bhj

Enclosure

cc: Mr. R. A. Thomas
Mr. G. F. Trawbridge
Mr. A. Schwencer

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Response to Evaluation of Responses
to IE Bulletins 79-06A and 79-06A Rev. 1

2. The Owner's Group will send the generic response and procedure revisions to the Nuclear Regulatory Commission on June 29, 1979.
3. Placing the low pressurizer level bistables in the tripped condition when these bistables are required to be operable by technical specifications is no longer applicable. A design change has been implemented and the technical specification change approved for the removal of automatic initiation of Safety Injection on coincident Low Pressurizer Pressure and Level and to add the automatic initiation of Safety Injection on 2/3 low pressurizer pressure signals.

It will not be necessary to change the Emergency Operating Procedures, because the Farley Operating Procedures states "Initiate a manual reactor trip or safety injection if the actuation parameters for reactor trip or safety injection exceed their actuation setpoints and automatic actuation does not occur". This change was incorporated into the procedure on May 18, 1979.

6. The plant utilizes a passive reactor coolant system relief system utilizing the bellows type spring loaded residual heat removal (RHR) system relief valves. One relief valve is installed in each of the two RHR pump suction lines downstream of the isolation valves. The relief valves discharge via a common header into the pressurizer relief tank. The relief valves are set to start opening at an upstream pressure of 450 psig and will be fully open at 495 psig.

Control room indications available for the plant operator's use to determine the system's condition are the following:

The operator has RHR valve position indication for the isolation valves with an associated alarm for incorrect valve position. Leaking will be detected using the alarms associated with the pressurizer relief tank. These alarms are high temperature, high pressure, and high level. When the system is in operation, there is an overpressure alarm which is actuated at 450 psig. Disarming of RHR isolation valve alarm and overpressure alarm is administratively controlled to allow defeat of the alarm when in modes where the low temperature overpressurization system is not required.

7. The Owner's Group will send the generic response and procedure revisions to the Nuclear Regulatory Commission on June 29, 1979.

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Response to Evaluation of Responses
to IE Bulletins 79-06A and 79-06A Rev. 1

8. At the time IE Bulletin 79-06A was received, FNP was in mode 6 for refueling and is currently still in mode 5. At this time the review of FNP procedures relating to valve alignments and requirements to perform valve alignments for safety related (Engineered Safeguards Features) systems has been completed. As a result of these reviews the following procedural changes were implemented:

- (1) Administrative Procedure for Operations Group Conduct of Operations was changed to make the requirements for performing system check lists more explicit.
- (2) Administrative Procedure for Equipment Status Control was changed to make the requirements for return to service of safety related equipment more explicit and to require explicit notification of the plant operator when such equipment is removed from or returned to service.

The performance of actual system checklists is being conducted prior to system operation for current plant conditions or prior to the system being declared operable to meet technical specification requirements. For example, the Auxiliary Feedwater System Checklist was performed on 5-28-79, to allow system operation. Due to the uncertainty of the startup schedule, no completion date can be provided for all checklist completion.

While the surveillance test procedures for all Engineered Safeguards Features System do not require periodic surveillance of locked valves, FNP Administrative Procedures in conjunction with System Operating Procedures require verification of position for all locked valves on at least a refueling basis. Due to the large number of locked valves in the Auxiliary Feedwater System, the monthly flow path verification surveillance test procedure for this system has been expanded to include verification of all locked valves in the Auxiliary Feedwater System flow path and those in possible bypass flow paths.

12. Alabama Power Company will request the Owner's Group to provide recommendations on how to determine if a noncondensable gas bubble has formed in the Reactor Coolant System. Because of the Westinghouse design of our Farley Plant the volume of the noncondensable gas is not a critical concern as it will be removed using the same methods regardless of the volume. Procedures for the removal of noncondensable gas from the Reactor Coolant System in a Post-Accident condition are under development and will be completed by October 31, 1979.