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October 24, 1979

Mr. Darrell G. Eisenhut, Acting Director
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Eisenhut:

As requested by your letter of September 13, 1979 concerning follow-up actions resulting from reviews regarding the Three Mile Island Unit 2 accident, Alabama Power Company submits the following:

Short Term Lessons Learned Commitments - Enclosure (1)

Emergency Preparedness Commitments - Enclosure (2)

As additional information is supplied by the Division of Operating Reactors clarifying requirements in the areas of Lessons Learned and Emergency Preparedness or as further study by Alabama Power Company requires, the commitments contained in the enclosures will be amended.

Yours very truly,

F. L. Clayton, Jr.

FLCJr/ODKJr:bhj

Enclosures

REFERENCES:
(1) NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short Term Recommendations", July, 1979.
(2) "Followup Actions Resulting from the NRC Staff Reviews Regarding The Three Mile Island Unit 2 Accident", September 13, 1979.
(3) Handouts at Atlanta Regional Meeting, "Regional Meetings TMI Short Term Implementation Action", September 28, 1979.

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cc: Mr. R. A. Thomas
Mr. G. F. Trowbridge

ENCLOSURE (1)
SHORT TERM LESSONS LEARNED COMMITMENTS

Section 2.1.1 - Emergency Power Supply Requirements for the Pressurizer Heaters, Power-Operated Relief Valves and Block Valves, and Pressurizer Level Indicators in PWR's

Pressurizer Heater Power Supply

Based on the analysis performed by Westinghouse for a three (3) loop PWR with a 1400 $ft^3$ pressurizer, a minimum of 125 kw pressurizer heater capacity is required to establish and maintain natural circulation following a loss of off-site power. This capacity is also sufficient to maintain natural circulation with small break LOCA and subsequent isolation. Westinghouse recommends that these heaters have the capability to be energized within one (1) hour following the loss of power. The Farley Unit #1 pressurizer is equipped with 78 individual heater elements assembled in five (5) groups. Heater groups A and B each contain 15 elements with a heater capacity of 269.25 kw per group. These heater groups have the capability of being powered from the emergency section of the 600V load centers 1A and 1C, respectively. These heater groups can be powered from either the normal or emergency bus by operation of breakers controlled from the control room. The Pressurizer Heater Back-Up Groups A and B are redundant and their associated circuits meet the separation requirements for redundant systems.

Procedures and training are being established to make the operator aware of when and how the required pressurizer heaters are to be connected to the emergency buses. The procedures will identify under what conditions other emergency loads may be shed from the buses in order to provide sufficient capacity for connection of the required heaters. The procedures and training will be complete by January 1, 1980.

Power Supply for Power-Operated Relief Valves and Block Valves

Farley Nuclear Plant has two (2) PORV's installed. Their associated circuits meet the separation requirements for redundant systems with one PORV powered from train "A" and the other powered from train "B". Each PORV is air-operated and equipped with two (2) solenoid valves in their respective air line. The solenoids are powered from train "A" and "B" 125V DC buses respectively. These buses are powered through associated battery chargers which can also be supplied from the train "A" or "B" diesel generator upon loss of offsite power or from 125V DC batteries.

Each PORV has a motor-operated block valve located in its respective piping. These valves' associated circuits meet the separation requirements for redundant systems. The operator and its associated control circuits for each block valve are powered from its associated train "A" or "B" emergency bus.

Pressurizer Level Indication Power Supply

There are three (3) channelized Pressurizer Level Indicators that receive signals from their corresponding channelized level transmitter. The power supply for each channelized indicator is provided by the correspondent 120V AC Vital and Regulated Channel (e.g. emergency bus).

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

Section 2.1.2 - Performance Testing for BWR and PWR Relief and Safety Valves

Alabama Power Company is part of an owner's group formed by utilities utilizing Westinghouse reactors in their plants. The Westinghouse Owner's Group is working in conjunction with the other PWR owners and the Electric Power Research Institute (EPRI) to develop a program for qualification of relief and safety valves under expected operating conditions, including solid-water and two-phase flow conditions. The program description and schedule will be submitted by January 1, 1980. Alabama Power Company will follow this program to obtain information that will allow analyses or testing of Farley Nuclear Plant specific valves and associated control circuitry, piping, and piping supports.

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

Section 2.1.3.A - Direct Position Indication of Relief and Safety Valves

The pressurizer power-operated relief valves have stem mounted limit switches which control red and green indicating lights in the valve control switch on the Main Control Board (MCB). This indicating system provides positive open and closed indication for these valves. There are temperature detectors in all relief and safety valve lines to the pressurizer relief tank with temperature indication on the MCB. In addition, temperature, pressure and level indication for the pressurizer relief tank are on the MCB. The temperatures, level and pressure are all annunciated in the MCB annunciator system and alarmed in the plant computer. These indicators will be used for safety valve indication until other positive indication technology can be demonstrated feasible.

There will be positive indication for the safety valves which will be indicated/alarmed in the control room. Alabama Power Company is evaluating the technical options for positive indication for the safety valves and the indication will be implemented after the most practical method has been determined.

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

## Section 2.1.3.B - Instrumentation for Detection of Inadequate Core Cooling in PWR's

### Procedures and Description of Existing Instrumentation

The Westinghouse Owner's Group, of which Alabama Power Company is a member, is performing analyses associated with the definition and recognition of inadequate core cooling conditions in accordance with Item 2.1.9. A description of the program and relations to this item is found in our response to Item 2.1.9.

### Primary Coolant Saturation Meter

Alabama Power Company will conform to NUREG-0578 requirements as much as possible to the state-of-the-art for this meter. Alabama Power Company will monitor the existing hot leg RTD's, core exit thermocouples, and reactor pressure sensors to compute temperature margin to $T_{sat}$ until a qualified Class I primary coolant saturation meter is available. The Shift Technical Advisor will be assigned primary responsibility for monitoring core subcooling condition in an accident condition. Alabama Power Company commits to install this equipment as soon as possible after it is available. Redundant temperature measurement will be accomplished by using inputs from the wide range Thot and Tcold sensors presently installed in each loop.

### Additional Instrumentation to Indicate Inadequate Core Cooling

A description of the program and commitment to meet this item can be found in our response to Item 2.1.9. The results of the analyses described in Item 2.1.9 will be used to determine the need for additional instrumentation.

In the opinion of Alabama Power Company the requirements of NUREG-0578 are satisfied for this section.

Section 2.1.4 - Containment Isolation Provisions for PWR's and BWR's

There are two phases of containment isolation at Farley. Phase A isolates all penetrations except component cooling water, containment spray, and systems essential for safe shutdown. Phase B isolates all remaining process lines except safety injection, containment spray, service water lines to containment coolers, and auxiliary feedwater.

Phase A isolation is initiated by all safety injection signals or manual initiation. Phase B isolation is initiated by containment pressure or manual initiation. A high radiation signal is also used for purge isolation.

Resetting of safety injection signals will not reopen isolation valves. Manual action is needed to open each valve.

A generic study is being undertaken by the Westinghouse Owner's Group to address essential and non-essential systems. Alabama Power Company will review this generic study to ensure that the systems are plant specific to Plant Farley. Plant Farley non-essential systems will be isolated by containment isolation signals. The results of this investigation will be provided to the NRC by the January 1, 1980 or two months after the receipt of the generic study, whichever is later.

In the opinion of Alabama Power Company the requirements of NUREG-0578 are satisfied for this section.

Section 2.1.5.A - Dedicated Penetrations for External Recombiner or Post-Accident External Purge System

The Farley Plant has redundant electric hydrogen recombiners permanently located in the containment for use in removing hydrogen gas in the containment atmosphere under post-accident conditions. These recombiners meet the engineered safety feature requirements; the controls and instrumentation for each are located on separate panels in the Main Control Room.

In addition, the Post-Accident Venting System is provided as a backup system for the redundant hydrogen recombiners. It consists of a supply line through which pressurizing air may be admitted to the containment and an exhaust line through which hydrogen-bearing gases may be vented from the containment. The gases are filtered to limit radioactive discharges.

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

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Section 2.1.5.C - Capability to Install Hydrogen Recombiner at Each Light Water Nuclear Power Plant

Farley Nuclear Plant has redundant electric hydrogen recombiners located inside containment for use in removing hydrogen gas from the containment atmosphere during post accident conditions. These recombiners meet all engineered safety feature requirements and the controls and instrumentation for each are located on separate panels in the Main Control Room. The emergency procedure for loss of coolant accident contains detailed instructions for operating the recombiners. Since this system is located inside containment and does not require mechanical hookup after an accident, personnel exposure during use is not a consideration at Farley.

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

Section 2.1.6.A - Integrity of Systems Outside Containment Likely to Contain Radioactive Materials (Engineered Safety Systems and Auxiliary Systems) for PWR's and BWR's

As part of its ALARA program and housekeeping program, Farley Nuclear Plant maintains leakage from systems that could or do contain radioactive fluid to as-low-as-practical levels on a corrective maintenance basis. This area will be reviewed to determine if additional immediate leak reduction measures are necessary and, if any are identified, they will be implemented.

FNP has procedural means for determining reactor coolant system, charging system, and letdown system leakage during operation. This procedure is run at least every 72 hours while the plant is operating. Methodology for measuring leakage from other systems does not exist at this time. A review and evaluation of whether leakage in those systems can be reasonably measured, considering personnel exposure and plant configuration, will be performed and submitted to the NRC by January 1, 1980. Leakage measuring programs identified will be implemented on an expedited basis and the results reported to the NRC.

The FNP preventive maintenance program will be reviewed with regard to system leak reduction and modified as necessary to ensure leakage is maintained as-low-as-practical. Integrated leak tests will be implemented if a thorough review of plant technical specification requirements, plant hardware and personnel exposure resulting from such testing show such testing to be practical.

In the opinion of Alabama Power Company the requirements of NUREG-0578 are satisfied for this section.

Section 2.1.6.B - Design Review of Plant Shielding and Environmental Qualification of Equipment for Spaces/Systems Which May be Used in Post-Accident Operations

Previous shielding design studies did not take into account the source terms required by the NRC. A shielding review has been initiated to identify areas which need improved shielding. This shielding review could use modified NRC source terms. The review will identify areas requiring access for operation of essential safe shutdown equipment. The radiation sources in these areas will be identified by a field walkdown or design review. The design review will be completed by January 1, 1980. The sheilding design review will be evaluated and to the extent that present plant design (e.g. physical constraints, piping location and supports, safety, etc.) allows, shielding will be upgraded in areas required for safe shutdown. These upgrades will be made by January 1, 1981.

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

Section 2.1.7.A - Automatic Initiation of the Auxiliary Feedwater System

The requirements of NUREG-0578 are met by the Farley Nuclear Plant.

Section 2.1.7.B - Auxiliary Feedwater Flow Indication to Steam Generators for PWR's

Auxiliary feedwater injection lines to each steam generator are provided with flow indication. This flow indication is on the Main Control Board and is powered from the plant emergency power. These flow instrument loops are testable. Redundancy requirements are met by qualified steam generator level instrumentation (Safety Grade).

The auxiliary feedwater line flow indicators will be seismically and environmentally qualified by January 1, 1981. This will meet all safety grade requirements.

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

Section 2.1.8.A - Post-Accident Sampling Capability

The existing sampling system for reactor coolant and containment air samples is not suitable for high level post-accident sampling. Study of this problem indicated that design of a new sampling system with adequate shielding will be required. The design and a description of the proposed plant modifications will be completed by January 1, 1980.

By January 1, 1980, Farley Nuclear Plant will prepare procedures for obtaining samples from the reactor coolant and containment atmosphere during post-accident conditions. Sampling will be as expeditious as possible and personnel exposure will be kept as low as practical in light of current plant design utilizing temporary shielding and improvised methods. If due to high level radioactivity, the plant laboratory cannot handle the samples they will be shipped to a properly equipped laboratory for analysis prior to completion of plant modifications. Assuming acceptable review of proposed plans by the NRC within a reasonable time period and if the required equipment is available, a target date of January 1, 1981 has been established for completion of plant modifications.

The Westinghouse owners group will develop a procedure for processing recommended samples by March, 1980. These procedures will be reviewed by Alabama Power Company for their applicability to the Farley Nuclear Plant.

The plant currently has in operation a computer-based Ge(Li) Gamma-Ray Spectroscopy System which can identify and quantitatively measure any radionuclide resulting from reactor operation or accident conditions. However, the dilution of post-accident samples will require completion of the shielded sampling facility discussed above.

No facilities currently exist for chemical analysis of highly radioactive post-accident primary coolant samples. The shielded sampling

facility discussed above is expected to provide space for limited chemical analysis of samples. Analysis procedures will be written within 60 days after completion of the proposed facility. Once procedures are developed they will be used as part of the emergency planning activity.

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

Section 2.1.8.B - Interim Procedures for Quantifying High Level Accidental Radioactive Releases

Procedures are being modified for estimating release rates based on Ge(Li) measurement of noble gases and radioiodines in small grab gas samples taken by modification of the existing stack gas sampling system. Procedures will be completed by January 1, 1980.

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

Section 2.1.8.B.1 - High Range Effluent Monitor

No known commercial on-line radiation monitor is available for measuring noble gas radioactivity levels of $10^5$ uCi/cc. The state of the art radiation monitors have ranges up to approximately $10^3$ uCi/cc; however, the response of these instruments is proportional to energy and may not satisfy the requirements of NUREG-0578. Further evaluation is in progress and different methods are being studied to approach the requirements of NUREG-0578. The results of this study will be completed and transmitted to the NRC by January 1, 1980. Alabama Power commits to installing a state-of-the-art effluent monitor by January 1, 1981.

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

Section 2.1.8.B.2 - High Range Effluent Radioiodine and Particulate Sampling and Analysis

An evaluation of different methods to measure the high range effluent radioiodine and particulate sampling and analysis is in progress. A method will be implemented by January 1, 1981.

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

Section 2.1.8.B.3 - High Range Containment Radiation

Alabama Power Company is presently evaluating the commercial availability of the radiation monitors in the range specified in NUREG-0578. The results of our evaluation will be reported to the NRC by January 1, 1980. Alabama Power Commits to installing a state-of-the-art containment radiation monitor by January 1, 1981.

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

Section 2.1.8.C - In-plant Iodine Instrumentation

Plant facilities now exist for iodine sampling and analysis by Ge(Li) Gamma-Ray Spectroscopy. High level gaseous concentrations may be of such magnitude that they could interfere with iodine measurements due to the noble gases being absorbed on charcoal; therefore, it will be necessary to use an alternate sampling medium. This capability will be in place by January 1, 1980.

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

Section 2.1.9 - Transient and Accident Analysis

1. Small Break LOCA analysis and preparation of emergency procedure guidelines.

   Small Break LOCA Analyses have been completed by the Westinghouse Owners Group, of which Alabama Power Company is a member, and transmitted to the NRC Bulletin and Orders Task Force on January 29, 1979 in WCAP-9600. Emergency procedure guidelines have been revised as a result of these reanalyses, reviewed by Westinghouse engineers and licensee operating personnel,and reviewed by the Bulletins and Orders Task Force. These guidelines were received by Alabama Power Company on October 8, 1979.

2. Implementation of small break LOCA emergency procedures and retraining of operators.

   Alabama Power Company commits to revise appropriate emergency operating procedures as a result of the effort described in item 1. Operators will be retrained on these procedures. Procedure revision and retraining will be completed by December 31, 1979.

3. Analysis of inadequate core cooling and preparation of emergency procedure guidelines.

   The Westinghouse Owners Group in conjunction with the Bulletins and Orders Task Force will address inadequate core cooling. The Westinghouse Owners Group analysis of inadequate core cooling and preparation of emergency procedure guidelines will be completed by October 31, 1979. This analysis effort and subsequent emergency procedure guideline revisions will address existing plant instrumentation and recovery from such a situation. Additional analyses to better define approaches to inadequate core cooling and appropriate emergency procedure guideline development will be completed in early 1980.

4. Implementation of emergency procedures and retraining related to inadequate core cooling.

Prior to this requirement Alabama Power Company completed emergency operating procedure revision and operator retraining as a result of lessons learned from TMI-2 in the area of inadequate core cooling. In addition, Alabama Power Company commits to revise appropriate emergency operating procedures as a result of the effort described in item 3. Operators will be retrained on these procedures. Procedure revision and retraining resulting from the October, 1979 analysis effort and guideline development will be completed by January 31, 1980 or three months after receipt whichever is later. Procedure revision and retraining resulting from the early 1980 analysis and guideline development will be completed within 3 months after receipt by Alabama Power Company of the revised guidelines.

5. Analysis of accidents and transients and preparation of emergency procedure guidelines.

Additional analysis of accidents and transients and preparation of emergency guidelines will be performed as agreed upon by the Bulletins and Orders Task Force and the Westinghouse Owners Group. Schedules will be developed by these groups for the completion of this effort. Identified work to date will be provided by the required date of January 1, 1980.

6. Implementation of emergency procedures and retraining related to accidents and transients.

Alabama Power Company commits to revise appropriate emergency operating procedures as a result of the effort described in item 5.

Operators will be retrained on these procedures. Procedure revision and retraining will be completed three (3) months after receipt by Alabama Power Company of the revised guidelines.

7. Analysis of LOFT small break tests.

This area is being handled between the Westinghouse Owner's Group and the Bulletins and Orders Task Force. The Owners Group is providing pretest prediction analysis of the LOFT L3-1 nuclear small break experiment. This analysis will be submitted by the required date of November 15, 1979.

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

Containment Pressure Indication (ACRS)

The present containment pressure indication provides continuous redundant indication in the Main Control Room and has an indication range of from -5 psig to +60 psig. The qualifications of the containment pressure indicators meet the requirements delineated in the Farley Nuclear Plant FSAR. These pressure transmitters and associated indicators are safety grade. The indicated range is adequate because the range exceeds the calculated peak pressure transient for a postulated loss of coolant accident and also exceeds the containment design basis peak pressure.

It is the opinion of Alabama Power Company that the requirement of the ACRS is satisfied for this section.

Containment Water Level Monitor (ACRS)

The Farley Nuclear Plant presently has two wide range containment water level detectors. These detectors provide indications in the Main Control Room that meet the wide range requirements as specified in your September 13, 1979 letter. These level transmitters and associated readout are safety grade.

The Farley Nuclear Plant will provide a narrow range containment level indication meeting the ranges specified in your September 13, 1979 letter by January 1, 1981.

It is the opinion of Alabama Power Company that the requirement of the ACRS is satisfied for this section.

Containment Hydrogen Indication (ACRS)

Two independent, redundant systems for containment hydrogen monitoring are provided. The design of these systems follows, as applicable, the requirements for safety-related protective systems and meets the requirements of IEEE 279-1971.

The output signal of the analyzers are indicated at the analyzer panel location and are recorded and alarmed in the Main Control Room.

Each system is supplied electrical power from an independent and redundant Class IE power supply.

The system meets the single failure criteria and remains operable under postulated accidents. Any single failure in one hydrogen monitoring system does not affect its redundant and independent counterpart.

It is the opinion of Alabama Power Company that the requirement of the ACRS is satisfied for this section.

Reactor Coolant System Venting

The Westinghouse Owners Group, of which Alabama Power Company is a member, has filed the small break LOCA analysis in response to I&E Bulletin 79-06. The results of this analysis concludes that reactor coolant system high point venting is not needed using the current plant design basis. However, evaluations are continuing to address the inadequate core cooling concerns of the NRC. Following completion of the evaluation of inadequate core cooling, Alabama Power Company's response will be modified as necessary.

It is the opinion of Alabama Power Company that the requirements for long term core cooling are satisfied for this section.

Section 2.2.1.A - Shift Supervisor Responsibilities

1. Corporate management will issue and periodically reissue a management directive that emphasizes the primary management responsibility of the Shift Supervisor for safe operation of the plant under all conditions on his shift and that clearly establishes his command duties.
2. Plant procedures will be reviewed to assure that the duties, responsibilities, and authority of the Shift Supervisor and control room operators are properly defined to effect the establishment of a definite line of command and clear delineation of the command decision authority of the Shift Supervisor in the control room relative to other plant management personnel. Particular emphasis shall be placed on the following:
   a. The responsibility and authority of the Shift Supervisor shall be to maintain a broad perspective of operational conditions affecting the safety of the plant as a matter of highest priority at all times when on duty in the control room. The idea shall be reinforced that the Shift Supervisor should not become totally involved in any single operation in times of emergency when multiple operations are required in the control room.
   b. The Shift Supervisor, until properly relieved, shall remain in the control room at all times during accident situations to direct the activities of control room operators. Persons authorized to relieve the Shift Supervisor shall be specified.
   c. If the Shift Supervisor is temporarily absent from the control room during routine operations, a licensed person shall be

designated to assume the control room command function. These temporary duties, responsibilities, and authority shall be clearly specified.

3. Training programs for Shift Supervisors shall emphasize and reinforce the responsibility for safe operation and the management function the Shift Supervisor is to provide for assuring safety.
4. Corporate management will review the administrative duties of the Shift Supervisor. Administrative functions that detract from safe operation will be delegated to other personnel.

This commitment will be implemented by January 1, 1980.

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

Section 2.2.1.B - Shift Technical Advisor

An individual on-shift will be designated by January 1, 1980 to serve in a dedicated capacity as Shift Technical Advisor during emergency conditions. This individual would report to the Shift Supervisor during emergency conditions and serve in a technical advisory capacity. Personnel designated for this function will not be part of the minimum shift complement as specified in the Technical Specifications. Designated individuals will have other duties during normal plant conditions.

By January 1, 1980, Alabama Power will place the best available qualified individual on shift. By January 1, 1981, the Shift Technical Advisor will receive additional training and periodic retraining commensurate with NUREG-0578 requirements. The Shift Technical Advisor will not be required to have a bachelor's degree in a science or engineering discipline.

The operating experience assessment function will be performed by the plant's system performance group which is composed of supervisory, engineering and technical personnel. This group is not functionally a part of the plant operations group. The systems performance group is a multi-disciplined group which has overview of all plant systems including mechanical, electrical and instrumentation and control. This group is dedicated to the operating experience assessment function which includes but is not limited to the following:

1. Engineering evaluation of the operating history of the plant (equipment failures, design problems, operations errors, etc.) and Licensee Event Reports from other plants of similar design, with suitable dissemination of the results of such evaluations to other members of the plant staff;

2. Engineering evaluation of the adequacy of the policy for maintenance, testing, equipment procurement, etc.
3. Engineering evaluation of continuing adequacy of plant operations quality assurance; and
4. Engineering evaluation of adequacy of plant emergency and operating procedures.

The operating experience assessment function will be implemented by January 1, 1980.

Shift Technical Advisors and personnel performing operating experience assessment function will communicate and appropriately advise each other of pertinent safety concerns.

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

Section 2.2.1.C - Shift and Relief Turnover Procedures

Plant procedures for shift and relief turnover will be reviewed and revised as necessary to assure the following:

1. A checklist has been provided for the shift relief of control room operators and the Shift Supervisor. The checklist does include the following items:
   a. Assurance that critical plant parameters are within allowable limits.
   b. Assurance of the availability and proper alignment of all systems essential to the prevention and mitigation of operational transients and accidents.
   c. Review of systems and components that are in a degraded mode of operation permitted by the Technical Specifications.
2. Checklists or logs have been provided for shift relief of assistant plant operators and equipment operators. Equipment that could degrade a system critical to the prevention and mitigation of operational transients and accidents or inititate an operational transient has been listed on the appropriate operators' checklist.
3. A system will be established to evaluate the effectiveness of the turnover procedure.

This commitment will be in effect by January 1, 1980.

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

Section 2.?.2.A - Control Room Access

Plant procedures will be reviewed and revised as necessary to assure the following:

1. The authority and responsibility of the persons in charge of limiting access to the "at the controls area" has been established.
2. A clear line of authority and responsibility in the control room in normal and emergency conditions has been established. The line of succession for persons in charge of the control room has been established. Lines of communication and authority for plant management personnel not in direct command of operation are defined.

This commitment will be in effect by January 1, 1980.

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

Section 2.2.2.B - On-Site Technical Support Center

An interim Technical Support Center will be established in an office on the west side of the Control Room (See attached Figure 1). This office is separate from the controls area, but is habitable to the same degree as the controls area for postulated accident conditions. Communications will be provided to the controls area, to the Operational Support Center, the NRC (red phone) and off site. This area will also have communication with the site Document Control Center for obtaining drawings not included in those kept in the interim Technical Support Center without undue delay. This interim Technical Support Center will be established for use by the Emergency Director and his staff by January 1, 1980. The plant Emergency Plan and implementing procedures will be revised to incorporate the role and location of the interim Technical Support Center as part of the emergency preparedness improvements by July 1, 1980.

Long term requirements for the Technical Support Center are presently being studied. Long range plans will be submitted to the NRC by January 1, 1980.

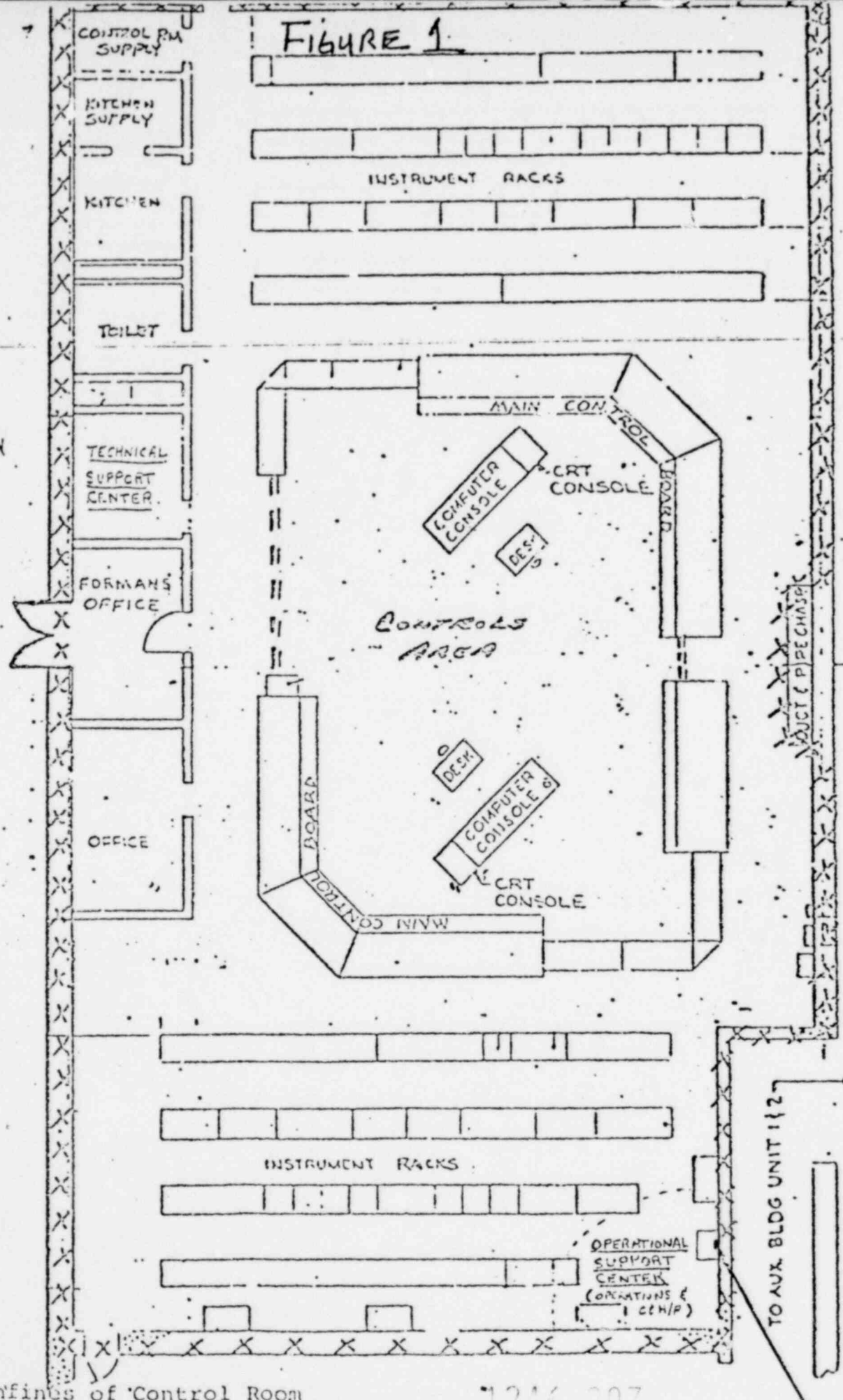
It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

Section 2.2.2.C - On-Site Operational Support Center

The southeast corner of the Control Room will be designated as the Operations Support Center for operations and chemistry and health physics personnel (see attached Figure 1). This area is separate from the controls area and will provide rapid response to requests for operations or chemistry and health physics support by the Shift Supervisor while precluding congestion of the controls area. All other plant support personnel will report to Operations Support Center areas designated in the plant Service Building. Communications exist between these areas and the controls area. These areas will be designated by January 1, 1980. The plant Emergency Plan will be revised to reflect the Operational Support Centers and establish methods of management and lines of communication as part of the improved emergency preparedness effort by July 1, 1980.

It is the opinion of Alabama Power Company that the requirements of NUREG-0578 are satisfied for this section.

# FIGURE 1




XXX— Confines of Control Room

= = = = Controls Area

Controls Area and Confines of Control Room (two unit operation)
Technical Support Center and Operational Support Center (Operations & CEH/P)

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FIGURE 1

ENCLOSURE (2)
EMERGENCY PREPAREDNESS COMMITMENTS

NEAR TERM REQUIREMENTS FOR
IMPROVING EMERGENCY PREPAREDNESS

1. Upgrade Emergency Plans to Regulatory Guide 1.101 with Special Attention to Action Level Criteria Based on Plant Parameters.

Farley Nuclear Plant will upgrade its Emergency Plan to satisfy the requirements of Regulatory Guide 1.101, Revision 1 (March, 1977).

Should the three State Governments with which Farley Nuclear Plant interfaces be unable to agree on a mutually compatible emergency condition classification system, Farley commits to have an emergency condition classification system that is compatible with the State of Alabama system.

This requirement will be met by July 1, 1980.

2. Implement Certain Short Term Actions Recommended by Lessons Learned Task Force and Use These in Action Level Criteria.

Farley Nuclear Plant will develop action level criteria that are related to the information provided by the post accident sampling, high range radioactivity monitors, improved in-plant radioiodine instrumentation and inadequate core cooling instrumentation upgrade requirements of NUREG-0578. Plant modifications are necessary prior to being able to implement all action level criteria. The Emergency Plan and associated implementing procedures will be revised in order to implement the new action level criteria; the schedule for meeting this commitment is as follows:

2.1.8(a) Post-Accident Sampling -

3 months after completion of plant modifications.

2.1.8(b) High Range Radioactivity Monitors -

Interim release data - July 1, 1980.

Permanent High Range Monitors - 3 months after installation complete.

2.1.8(c) Improved in-plant iodine instrumentation -

July 1, 1980.

2.1.3(b) Instrumentation for detection of inadequate core cooling -

Utilization of Current Instrumentation - July 1, 1980.

Upgraded Instrumentation - 3 months after installation complete.

3. Establish Emergency Operations Center for Federal, State and Local Officials.

Farley Nuclear Plant will designate an Emergency Operations Center at the plant site by July 1, 1980 and will upgrade the center in conjunction with the plant Technical Support Center. This Center will be designated in the Farley Emergency Plan for use by Federal, State and Local Officials during an accident. In addition a backup Emergency Operations Center (off-site location) will be designated by July 1, 1980.

The Farley Emergency Plan will also designate a State of Alabama Emergency Operations Center. This center is used for all emergencies affecting Houston County, Alabama (e.g. Farley Plant is located in this county) and would be the focal point for state/local operations if an emergency condition existed at the Farley Plant.

4. Improve Offsite Monitoring Capability.

Farley Nuclear Plant will improve off-site monitoring capability by placing additional TLD's off-site. These additional TLD's will bring the total number to 40 by July 1, 1980.

It is our understanding that this meets requirements of the NRC draft staff position on Standard Effluent Technical Specifications now awaiting approval.

5. Assure Adequacy of State/Local Plans.

Alabama Power Company will offer to provide technical review and assistance to the States of Alabama, Georgia and Florida and local agencies to assure the adequacy of their plans. Please understand that Alabama Power Company does not have authority over state/local governments to require compliance with emergency planning requirements if such an issue should arise. It has not in the past. Alabama Power pledges its support in helping resolve problems as state/local plans are upgraded.

6. Conduct Test Exercises (Federal, State, Local, Licensee).

Test exercises of the Emergency Plans will be conducted on the following schedule:

a. State of Alabama Drill (General Emergency) - November, 1979
b. Farley Fire and Personnel Emergency Drill - November, 1979
c. Farley General Emergency Drill - Mid 1980
d. Joint Test Exercise - Within 5 Years