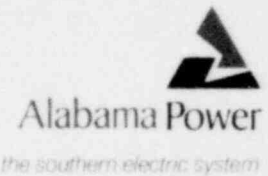


Mailing Address
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F. L. Clayton, Jr.
Senior Vice President
Flintridge Building



July 13, 1981

Docket Nos. 50-348
50-364



Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. S. A. Varga

Joseph M. Farley Nuclear Plant - Units 1 & 2
Environmental Protection Plan

Gentlemen:

Alabama Power Company has reviewed the proposed draft Environmental Protection Plan (EPP) provided by Mr. Ed Reeves of your staff. It is our understanding that the staff intends to issue this EPP as an amendment to Operating License NPF-2 for Farley Unit 1 and to also incorporate certain changes into the EPP for Operating License NPF-8 for Unit 2 via certain editorial changes to that operating license. Alabama Power Company is in agreement with the draft EPP and the procedure proposed by your staff for implementing these changes. Since changes to Operating License NPF-8 will be editorial, no request from Alabama Power Company is necessary and no fee for this action is required.

My letter of May 28, 1981, regarding Joseph M. Farley Nuclear Plant Unit 1 Technical Specifications Upgrade, requested that the EPP for Unit 1 be made effective as of January 1, 1982. This request was based on the fact that the current Environmental Technical Specifications (Appendix B) contain both radiological and nonradiological requirements. The present schedule for the Farley Unit 1 Technical Specification upgrade should result in the radiological aspects of the current Environmental Technical Specifications being issued as a section of Appendix A in sufficient time to allow implementation by January 1, 1982. Issuing the EPP concurrent with the upgraded Appendix A as requested in my letter of May 28, 1981 would permit the transition to be consistent with the reporting periods which in turn would allow completeness and consistency in the individual reports. Also, this would negate the requirement to amend the current ETS document while awaiting publication of the EPP. Therefore, we still request that the EPP as proposed be issued as soon as possible with an effective date of January 1, 1982.

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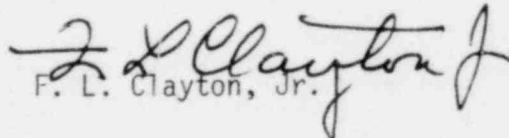
Joseph M. Farley Nuclear Plant - Units 1 & 2
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July 13, 1981
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The current Appendix B to Operating License NPF-2 contains requirements for certain studies to be commenced when Unit 2 of the Farley Nuclear Plant is declared commercial. Specifically, Section 3.1 of the current ETS requires "beginning with commercial operation of Unit 2, studies shall be conducted during two unit operation for 18 months." The specific programs to which this requirement applies are found in Sections 3.1.1(a)-1, 3.1.1(a)-2, 3.1.1(b)-1, 3.1.1(b)-2, 3.1.2(a)-1, and 3.1.2(a)-2. In addition, Section 4.2 of the current ETS for Unit 1 contains requirements for thermal mapping studies to be "conducted as soon as possible after both units of FNP become operational."

Findings relative to each of the aforementioned study areas in Sections 3.1 and 4.2 of the current ETS for Unit 1 have been made by your staff. These issues have been resolved through the submission of reports by Alabama Power Company as part of the Unit 1 Technical Specifications and also by changes in commission policy relative to the regulation of water quality issues controlled by other federal or state agencies. Since the proposed EPP for Unit 1 deletes these studies, it is Alabama Power Company's intention not to initiate any monitoring programs for these areas once Unit 2 is declared commercial as discussed in a meeting with your staff on July 29, 1980 and my letter of August 7, 1980. To do so would be a waste of both money and manpower on activities which would not provide any useful information and would subsequently be terminated on January 1, 1982 or the effective date of the revised EPP for Unit 1.

Thank you for your consideration and the cooperation of your staff in this matter. If you have any questions, please advise.

Yours very truly,


F. L. Clayton, Jr.

WGW:bs

cc: Mr. R. A. Thomas
Mr. G. F. Trowbridge
Mr. E. A. Reeves
Mr. J. P. O'Reilly
Mr. W. H. Bradford