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



September 9, 1981

Docket No. 50-348

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

Attention: Mr. S. A. Varga

Gentlemen:

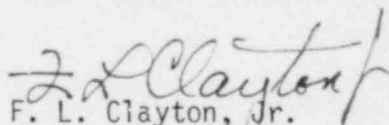


July 10, 1981 NRC Order for  
Unit 1 TMI Requirements

On July 10, 1981 the NRC issued an order confirming Alabama Power Company's commitments on Post-TMI related issues. These commitments were derived from Alabama Power Company's submittals of January 14, February 5, February 9, February 13, February 23 and February 23, 1981. Alabama Power Company hereby provides an update on our compliance with the NRC order by addressing each of the items identified in the order. Enclosure 1 is a listing of our responses to these items.

If you have any questions, please advise.

Yours very truly,

  
F. L. Clayton, Jr.

FLCJr/JAR:jc

Enclosure

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

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## ENCLOSURE 1

Item	Title	Applicability	Specific Requirement	Impl/Doc	APCo Response		Remarks
				Subm Due Dates	Let*	Date	
I.A.1.1	STA	ALL	(a) Provide STA coverage by degreed individuals (or equivalent), trained to licensee's program.	1/1/81		2/5/81	STA coverage provided; individuals trained.
			(b) Submit description of current training program and demonstrate compliance with 10-30-79 letter	1/1/81		2/5/81	Description provided; compliance demonstrated.
			(c) Submit description of long term training program.	1/1/81		2/5/81	Description provided.
I.A.2.1	Reactor Operator Qualification	ALL	Submit description of and implement Upgraded Training Program.	8/1/80		7/10/80 1/14/81	Description provided; program implemented.
I.C.1	Accident Procedures	ALL	(a) Submit reanalyses of inadequate core cooling and propose guidelines for emergency procedures, OR propose schedule and justify delays.	1/1/81		1/14/81 W.O.G.* letter 80-179, 12-15-80	APCo will upgrade procedures and training per available W.O.G. guidelines, if necessary, by the end of the third Refuel Outage (2-1-82)
			(b) Submit reanalysis of transients and accidents for emergency procedures, OR propose schedule and justify delays.	1/1/81		1/14/81 W.O.G. letter 80-179, 12-15-80	W.O.G. response provides reanalysis and schedule.
I.C.5	Feedback of Operating Experience	ALL	Implement procedures for feedback of operating experience (no documentation submittal is required).	1/1/81		1/14/81	Procedures implemented.
I.C.6	Correct Performance or Operating Activities	ALL	Implement procedures to verify correct performance of operating activities (no documentation submittal is required).	1/1/81		2/5/81	Procedures implemented.

\* Westinghouse Owner's Group (W.O.G.)

<u>Item</u>	<u>Title</u>	<u>Applicability</u>	<u>Specific Requirement</u>	<u>Impl/Doc Subm Due Dates</u>	<u>APCo Response Letter Date</u>	<u>Remarks</u>
II.B.2	Shielding	ALL	(a) Have available design details for vital area modifications.	1/1/81	2/23/81	APCo has completed all shielding modifications except the electrical disconnect modification and relocation of the electrical penetration room door. These modifications require a plant outage to implement and will be completed by the NUREG-0737, II.B.2 specified date of July 1, 1982.
			(b) Submit technical deviations to staff positions.	1/1/81	2/23/81	Details available; deviations provided.
II.B.3	Post-Accident Sampling	ALL	Submit description of deviations from staff positions.	1/1/81	1/14/81	Description provided.
II.B.4	Training to Mitigate Core Damage	ALL	(a) Have available for review a training program for mitigating core damage (no documentation submittal required).	1/1/81	2/9/81	Program provided.
			(b) Implement training program (no documentation submittal required).	4/1/81	2/9/81	APCo will complete training program for mitigating core damage by 10/1/81.

<u>Item</u>	<u>Title</u>	<u>Applicability</u>	<u>Specific Requirement</u>	<u>In Subm D.</u>	<u>APCo Response Letter Date</u>	<u>Remarks</u>
II.D.1	Performance Testing of RV/SRV's	ALL	(a) Submit test program (both BWR/PWR's)	7/1/80 (PWR's) 10/1/80 (BWR's)	6/25/81	APCo is part of EPRI test program.
			(b) Submit qualification program for PWR's block valve.	1/1/81	6/25/81	A documented report (prepared by EPRI) will be submitted by April, 1982 based on existing data to satisfy this requirement.
II.E.1.2	Aux Feed Initiation and Flow	PWRs	(a) Submit final design and documentation on safety grade flow indication.	1/1/81	2/9/81	Design and documentation provided.
			(b) Submit final design and documentation on safety grade flow initiation.	1/1/81	2/9/81	Design and documentation provided.
II.E.4.2	Containment Isolation	ALL	(a) Submit documentation justifying minimum containment pressure setpoint for isolation of non-essential penetrations.	1/1/81	2/13/81	Documentation provided; setpoint set to 4.0 psig on 7-1-81.
			(b) Submit statement that purge valves not meeting CSB 6-4 (or interim position) are sealed and verification is performed every 31 days.	1/1/81	2/09/81	To be installed at next refueling outage after receipt of valves (April, 1982); currently scheduled for the fourth refueling outage (3-25-83). Additional information to be provided 9-25-81 as required by 8-5-81 NRC letter.

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II.F.1	Post-Accident Monitoring	ALL	(a) For noble gas monitor and iodine/particulate sampling and analysis submit description and justification for deviations from staff requirements.	1/1/81	2/13/81	Description submitted (2-13-81) for additional accident monitors which includes deviations. APCO will install the Atmospheric Relief Radiation Monitors (RE-60 A, B, C, D) during the third Refuel Outage (2-1-82) due to unacceptable working conditions on the Aux Building roof at power.
			(b) Have available the final design information for noble gas monitor and iodine/particulate sampling and analysis.	1/1/81	2/13/81	See above
II.F.2	Inst. for Inadequate Core Cooling	ALL	Submit a report detailing the planned instrumentation system for monitoring inadequate core cooling.	1/1/81	6/11/81 6/1/81	Report submitted 6-1-81
II.K.2.10	Antic. Trip on LOFW and TT	B&W	Submit final design for anticipatory trip as described in NUREG 0737.	1/1/81	N/A	N/A (B&W)
II.K.2.13	Thermal Mechanical Report	B&W	Submit report on effects of Hi Pressure Injection on vessel integrity for SB LOCA with no Aux Feedwater.	1/1/81	1/14/81 W.O.G. 81-138, 4/1/81	W.O.G. response submitted report 4-1-81.

## ENCLOSURE 1 (cont'd)

<u>Item</u>	<u>Title</u>	<u>Applicability</u>	<u>Specific Requirement</u>	<u>Impl/Doc Subm Due Dates</u>	<u>APCO Response Letter Date</u>	<u>Remarks</u>
II.K.3.2	PORV/SV Failures	PWR	Submit report on SB LOCA and probability of failure of PORV/SV/RV.	1/1/81	1/14/81 WCAP-9804, 3/13/81	Report submitted 3-13-81
II.K.3.3	SRV/SV Failures & Challenges	ALL	Submit report (historical and annually thereafter) of SRV/SV failures and challenges.	1/1/81	1/14/81	Is submitted as part of monthly operating report.
II.K.3.7	PORV Opening Probability	B&W	Submit report on the probability of a PORV opening during an over-pressurization transient.	1/1/81	N/A	N/A (B&W)
II.K.3.9	PID Controller Modification	Selected <u>W</u> plants	Modify the Proportional Integral Derivative Controller (as recommended by <u>W</u> ). Advise NRC when modification is completed.	12/1/80	6/26/80	PID Controller derivative set a 0.
II.K.3.12	Anticipatory Trip on Turbine Trip	<u>W</u>	Submit confirmation of Anticipatory Trip. If not currently implemented, submit modification design and schedule for implementation.	1/1/81	6/26/80	Confirmed.
II.K.3.13	Separation of HPCI/RCIC Initiation Levels; Auto Restart of RCIC	BWRs w/HPIC/ RCIC	Submit results of evaluation and proposed modification as appropriate	1/1/81	N/A	N/A (BWR)
II.K.3.16	Reduce Challenges to RV's	BWR	Submit report on actions planned to reduce RV challenges.	4/1/81	N/A	N/A (BWR)
II.K.3.17	ECCS System Outages	ALL	Submit report on ECCS outages and propose changes to reduce outages.	1/1/81	2/13/81	Report submitted 2-13-81
II.K.3.18	ADS Logic Modification	BWR	Submit report of feasibility of ADS system logic changes to eliminate need for manual actuation.	4/1/81	N/A	N/A (BWR)
II.K.3.21	CSS/CPCI Restart	BWR	Submit report of evaluation, proposed modifications and analysis to satisfy staff positions.	1/1/81	N/A	N/A (BWR)

<u>Item</u>	<u>Title</u>	<u>Applicability</u>	<u>Specific Requirement</u>	<u>Impl/Doc Subm Due Dates</u>	<u>APCo Response Letter Date</u>	<u>Remarks</u>
II.K.3.22	RCIC Suction	BWR w/RCIC	Implement procedure and document verification of this change	1/1/81	N/A	N/A (BWR)
II.K.3.27	Common Reference for H <sub>2</sub> O Level Instruments	BWR	Implement change and submit documentation of changes.	1/1/81	N/	N/A (BWR)
II.K.3.29	Isolation Condensor Performance	BWR w/ICs	Submit evaluation of I.C. performance.	4/1/81	N	N/A (BWR)
II.K.3.30	SB LOCA Methods	ALL	Submit outline of program for model.	11/15/80	Westinghouse 9/26/80 (NS-TMA-2318)	Outline submitted 9-26-80.
II.K.3.44	Fuel Failure	BWR	Submit evaluation to verify no fuel failure.	1/1/81	N/A	N/A (BWR)
II.K.3.45	Manual Depressurization	BWR	Submit evaluation on other than ADS method for depressurization.	1/1/81	N/A	N/A (BWR)
III.D.3.3	Improved implant iodine Monitoring	ALL	Have available means to accurately measure airborne radioiodine implant during an accident.	1/1/81	1/14/81	System proven to be functional and procedures for calibration and operation available.
III.D.3.4	Control Room Habitability	ALL	a. Submit control room habitability evaluation information.	1/1/81	6/26/80	Evaluation submitted 6-26-80
			b. Submit modifications necessary to assure CR habitability with a schedule for completion.	1/1/81	6/26/80	Modification not required.