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November 5, 1982

Docket No. 50-348

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

Attention: Mr. S. A. Varga

Joseph M. Farley Nuclear Plant - Unit 1  
Mechanical Snubber Functional Test  
Technical Specification Change Request

Gentlemen:

In accordance with Technical Specification 4.7.9.e. for Unit 1, Alabama Power Company is required to perform functional testing of mechanical snubbers using a representative sample prior to startup following the fourth refueling outage. This testing requires the purchase of sophisticated test equipment, the development of a test facility, and the training of plant personnel. Due to the complexity of mechanical snubber functional testing and the rapidly changing development of proper test equipment, suitable test equipment needed to comply with the subject test provisions was not commercially available until mid-1982. Based on this mid-1982 date of test equipment availability and the lead time for this equipment, there is insufficient time to purchase, receive and install equipment and complete training of personnel to support mechanical snubber functional testing as required by Technical Specification 4.7.9.e. until after the Unit 1 fourth refueling outage. Therefore, Alabama Power Company respectfully requests that the Unit 1 Technical Specification 4.7.9.e. requiring implementation of mechanical snubber functional testing prior to startup following the fourth refueling outage be changed to require that such testing be performed prior to startup following the fifth refueling outage. This proposed change is incorporated into the attached revised pages (Attachment 1).

The objective of mechanical snubber functional testing is to add further assurance, based on testing of a random sample, that the mechanical snubbers are operable. This is to be accomplished by the following verifications:

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1. The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force.
2. Activation (restraining action) is achieved within the specified range in both tension and compression.
3. Snubber release rate, where required, is within the specified range in compression or tension. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

These performance characteristics can be quantified only by testing the mechanical snubber in a suitable test machine. As a result of incorporation of the testing requirements into the Standard Technical Specifications, virtually all mechanical snubber test machine design and development has occurred within the past two years. Various designs and numerous approaches to the test machine concept have been developed by different vendors. Due to rapid development and frequent changes in machine design, a functional prototype machine, which Alabama Power Company considered to be satisfactory for use with FNP snubbers, did not become available for demonstration until mid-1982. Alabama Power Company has carefully reviewed the test machines currently available and is in the process of receiving quotations from vendors for a test machine. Once the procurement process is completed and a purchase order is issued, machine delivery is expected to take approximately six (6) months. Prior to the initiation of testing, the test machine must be received and installed in a suitable test facility and personnel trained to perform mechanical snubber functional testing. Based on the unavailability of a suitable test machine as described above and the time required to establish a snubber test facility, Alabama Power Company will not be able to functionally test Unit 1 mechanical snubbers until the fifth refueling outage.

Alabama Power Company will continue to verify the operability of mechanical snubbers by the performance of inspections required by Technical Specifications 4.7.9.a and 4.7.9.b. These inspections verify that there are no visible indications of damage or impaired operability and that attachments to the foundation or supporting structure are secure. Mechanical snubbers which appear to be inoperable as a result of these inspections and which cannot be verified as being operable in accordance with Technical Specification 4.7.9.b will be replaced with operable snubbers.

In conclusion, due to the time required to develop, procure, manufacture, install and check-out a suitable test machine for mechanical snubber functional testing, Alabama Power Company proposes to initiate the requirements of Technical Specification 4.7.9.e prior to startup following

the fifth refueling outage. Delaying the functional test requirement would enable Alabama Power Company to procure a state-of-the-art test machine and would allow adequate development of the required facilities and personnel training.

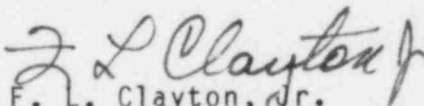
The Plant Operations Review Committee of Alabama Power Company has reviewed this proposed change to the Technical Specifications and has determined that the change does not involve an unreviewed safety question as shown in the attached safety evaluation (Attachment 2). The Nuclear Operations Review Board is scheduled to review this change at the next meeting.

Your response to the proposed Technical Specification change is respectfully requested by December 1, 1982 in order to be compatible with the planning of work for the upcoming fourth refueling outage.

This proposed amendment is designated as Class III in accordance with 10 CFR 170.22 requirements. Enclosed is a check for \$4,000 to cover the total amount of fees required.

In accordance with 10 CFR 50.30(c)(1)(i), three signed originals and forty (40) additional copies of the proposed changes are enclosed.

Yours very truly,

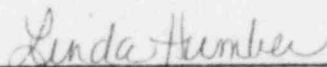
  
F. L. Clayton, Jr.

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Attachments

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

SWORN TO AND SUBSCRIBED BEFORE ME  
THIS 5th DAY OF November, 1982

  
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Notary Public

My Commission Expires

11-29-82

ATTACHMENT 1

Proposed Unit 1 Technical Specification 4.7.9

New Page 3/4 7-23

Revised Unit 1 Technical Specification 4.7.9

Revised Page 3/4 7-23