

DSOG
Southern Nuclear Operating Company
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 868-5086

6720

T. Dunning
58F218118
4/7/93



Southern Nuclear Operating Company (4)
the southern electric system

J. D. Woodard
Vice President
Farley Project

May 21, 1993

Docket Nos. 50-348
50-364

Chief, Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Comments on "The Relocation of the Technical Specification Tables
on Instrument Response Time Limits"
(58 Federal Register 18118 of April 7, 1993)

Gentlemen:

Southern Nuclear Operating Company has reviewed the proposed generic communication, "The Relocation of the Technical Specification Tables on Instrument Response Time Limits," published in the Federal Register on April 7, 1993. In accordance with the request for comments, Southern Nuclear Operating Company provides the following.

- Enclosure 1 of the proposed generic communication states:

However, a footnote in the table of response time limits for the RTS states that neutron detectors are exempt from response time testing. To retain this exception, which is stated only in the table being removed from the TS, the surveillance requirements for the RTS should be modified to add the following statement:

Neutron detectors are exempt from response time testing. Each licensee that wishes to implement this line-item TS improvement should confirm that the plant procedures for response time testing include acceptance criteria that reflect the RTS and the ESFAS response time limits in the tables being relocated from the TS to the updated FSAR. The licensee should also provide a commitment to include the RTS and the ESFAS response time limits in the next update of the FSAR.

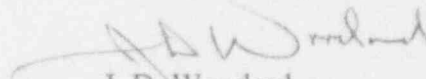
9306090005 930521
PDR ADDCK 05000348
H PDR

Although Enclosure 1 of the proposed generic communication states that the neutron detectors are exempt from response time testing, this point is not incorporated into the model technical specifications found in Enclosure 2. It is the position of Southern Nuclear Operating Company that the exemption of neutron detectors from response time testing should be incorporated into the model technical specifications.

- Both Enclosures 1 and 2 of the proposed generic communication reference NUREG-0452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors"; therefore, the proposed generic communication appears to only apply to Westinghouse PWRs. However, basically the same requirements for response time testing appear in the BWR/4 Standard Technical Specifications, including the exemption for response time testing of the neutron detectors. Therefore, the proposed generic communication should, in addition to addressing response time testing for PWRs, address response time testing for BWRs as well.

Should you have any questions, please advise.

Respectfully submitted,


J. D. Woodard

TWS/JDW

cc: Southern Nuclear Operating Company
R. D. Hill, Plant Manager

U. S. Nuclear Regulatory Commission, Washington, DC
T. A. Reed, Licensing Project Manager, NRR

U. S. Nuclear Regulatory Commission, Region II
S. D. Ebner, Regional Administrator
G. F. Maxwell, Senior Resident Inspector