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USNRC REGION II  
ATLANTA, GEORGIA

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Alabama Power

the southern electric system

May 7, 1982

Docket Nos. 50-348  
50-364

Mr. R. C. Lewis, Director  
Division of Project and Resident Programs  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, N.W. Suite 3100  
Atlanta, Ga. 30303

RE: Systematic Assessment of Licensee Performance (SALP)  
Board Report for FNP Units 1 and 2  
Dated April 22, 1982

Dear Sir:

Alabama Power Company has reviewed the referenced report and believes that this report accurately assesses our performance in the areas evaluated by the SALP Board in all but one case.

In Section IV.A.6.a, the statement is made that the "licensee failed to submit a timely request for exemption for meeting Appendix R". 10CFR50.48 and Appendix R became effective on February 17, 1981. 10CFR50.48(c)(6) requested that "in the event that a request for exemption from a requirement to comply with one or more of the provisions of Appendix R . . . (it shall be) . . . filed within 30 days of the effective date of this rule." On March 19, 1981, Alabama Power Company filed a detailed plan and schedule for compliance with Appendix R for both Units 1 and 2 which clearly showed, as stated in that letter, that several of these completion dates are "beyond the NRC (required) schedule." This letter was discussed on several occasions with the NRC Staff at which time it was brought to our attention that the March 19, 1981 letter did not reference the exemption section of the rule and probably needed clarification. On June 23, 1981, Alabama Power Company submitted a supplement to the initial letter stating that while we "did not explicitly request an exemption from the Nuclear Regulatory Commission . . . we hereby advise you that the intent of that letter was to seek exemptions . . . and (is) herein restated." Based on discussions with the NRC Staff and on evaluation of these letters, Alabama Power Company concludes that the referenced statement from the SALP report is incorrect.

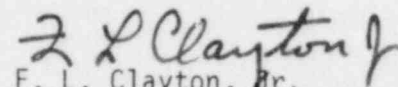
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Mr. R. C. Lewis  
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If there are any questions, please contact us.

Very truly yours,

  
F. L. Clayton, Jr.

FLCJr/MAL:awm

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