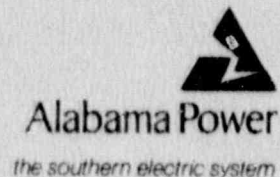


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July 10, 1990



Docket Nos. 50-348  
50-364

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

Gentlemen:

Joseph M. Farley Nuclear Plant  
Generic Letter 83-28, Items 4.2.3 and 4.2.4

Generic Letter 83-28, Items 4.2.3 and 4.2.4, required licensees to describe their preventive maintenance and surveillance programs to ensure reliable reactor trip breaker operation and to include a program description for life testing of the breakers and periodic replacement consistent with demonstrated life cycles. By letter dated November 4, 1983, Alabama Power Company responded to Items 4.2.3 and 4.2.4 stating that Alabama Power Company was participating in the Westinghouse Owners Group (WOG) to develop a specific program for life testing of the reactor trip breakers and periodic maintenance and replacement of breakers and components consistent with demonstrated life cycles.

By letter dated August 4, 1987, the NRC informed Alabama Power Company that the program developed by the WOG, WCAP-10835, was not an acceptable response for meeting Items 4.2.3 and 4.2.4. As a result of this denial, Alabama Power Company informed the NRC, by letter dated October 9, 1987, that the WOG would further evaluate these issues and that Alabama Power Company would provide the NRC with a proposed schedule for responding to the issues after the WOG schedule was finalized.

At this time, the WOG has determined that the issues delineated in Items 4.2.3 and 4.2.4 of Generic Letter 83-28 will not be pursued by a WOG program. Alabama Power Company is therefore submitting a final response to Items 4.2.3 and 4.2.4 in order that the NRC may issue to Alabama Power Company a safety evaluation to close these issues.

Since the reactor trip switchgear at Farley Nuclear Plant is located in a mild environment, the environmental qualification parameters defined by 10CFR50.49(d) and IEEE standard 323-1974, which includes aging and establishment of a qualified life, do not apply. The reactor trip breakers have extensive quality assurance, maintenance and surveillance programs which are sufficient for demonstrating qualification of equipment located in a mild environment. The reactor trip switchgear, with the exception of the STA and UVTA, does not experience degradation due to thermal aging based on the application and function of the breakers. For mechanical wear of the breakers, the Alabama Power Company maintenance

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program consisting of lubrication, inspection, trending and surveillance adequately addresses mechanical wear and alerts Alabama Power Company to any degraded condition of the breakers.

It is the position of Alabama Power Company that procedures currently utilized by Farley Nuclear Plant constitute an acceptable ongoing life testing program for the reactor trip breakers and components. These procedures, while not structured to specifically define component lifetime and replacement intervals, are structured to ensure that the functional capability and reliability of the components are maintained. It is further noted that the NRC issued to Alabama Power Company a safety evaluation report on October 24, 1985 stating that the procedures constituted an acceptable maintenance program for the Farley Nuclear Plant reactor trip breakers as required by Item 4.2.1 of Generic Letter 83-28.

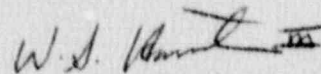
The shunt trip attachment (STA) and undervoltage trip attachment (UVTA) on the reactor trip breakers are also located in mild environments at Farley Nuclear Plant. Both the STA and UVTA were tested by Westinghouse and the results published in WCAP-10835. The results of the test show that both the STA and UVTA successfully withstood 2500 trip operations with no failures. In addition to the surveillance performed on these components, Farley Nuclear Plant procedures also specify that the UVTA and STA be replaced after 1250 cycles of operation. This procedural requirement is based upon Westinghouse recommendations resulting from the testing presented in WCAP-10835.

In conclusion, it is the position of Alabama Power Company that a satisfactory ongoing life testing program is in place for the Farley Nuclear Plant reactor trip breakers. As stated previously, this position is based on the maintenance, testing and surveillance of the breakers themselves in conjunction with the maintenance and conservative replacement intervals for the STA and UVTA. It is therefore the position of Alabama Power Company that the requirements of Items 4.2.3 and 4.2.4 of Generic Letter 83-28 have been adequately addressed.

If there are any questions, please advise.

Respectfully submitted,

ALABAMA POWER COMPANY



W. G. Hairston, III

WGH,III/RGW:mV.754

cc: Mr. S. D. Ebner  
Mr. S. T. Hoffman  
Mr. G. F. Maxwell