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February 2, 1983

Docket Nos. 50-348
50-364

Mr. J. P. O'Reilly
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II, Suite 3100
101 Marietta Suite N. W.
Atlanta, Georgia 30303

1982 Systematic Assessment of Licensee Performance (SALP)
for Farley Nuclear Plant
NRC Report Nos. 50-348/82-28 and 50-364/82-28

Dear Mr. O'Reilly:

The subject SALP Assessment, paragraph 5a, identified the "lack of physical examinations required for fire brigade members" and "substandard welding and cutting fire prevention procedures" as open items of the Farley Nuclear Plant Fire Protection Program. Alabama Power Company responded to this assessment by letter of December 21, 1982. On January 4, 1983, representatives of the NRC Regional Staff, including Messrs. Conlin and Miller, and Alabama Power Company staff members, Messrs. O. D. Kingsley, Jr. and R. L. George, discussed the applicability of the Farley Nuclear Plant Fire Protection Program and its compliance with Appendix R. As discussed, the position of Alabama Power Company is that the present use of flame permits to control welding and cutting and the now current use of annual physical qualifications for fire brigade members at Farley Nuclear Plant are adequate and satisfy the provisions of Appendix A to Branch Technical Position BTP APCSB 9.5-1. In addition, it was noted that 10CFR50.48 provides that Branch Technical Position BTP APCSB 9.5-1 and Sections III.G, III.J and III.O of Appendix R be applied to operating plants with NRC Staff accepted safety evaluation reports. The Farley Nuclear Power Plant received such a safety evaluation report by the issuance of the Joseph M. Farley Safety Evaluation Report, Fire Protection Review, Units 1 and 2, dated February 12, 1979, as Amendment 11 to Farley Unit 1 Operating License No. NPF-2. As requested in Alabama Power Company letter dated December 21, 1982, and reiterated in the January 4, 1983 discussion, these two open items should be closed and removed from

Mr. J. P. O'Reilly
U. S. Nuclear Regulatory Commission

February 2, 1983
Page 2

from the subject SALP Assessment since the now current Alabama Power Company program complies with all applicable licensing provisions.

The discussion on January 4, 1983 of the Alabama Power Company position is herein summarized as clarification to the December 21, 1982 letter.

Applicability of Appendix R to Farley Nuclear Plant

The applicability of Appendix R was addressed in Alabama Power Company letter dated March 19, 1981 which provided the NRC a plan and schedule to comply with the provisions of Appendix R. Regarding both Units 1 and 2, this letter stated, "Alabama Power Company has recently completed extensive modifications and upgrades to its fire protection program as a result of the Fire Protection Program Reevaluation; therefore, only Sections III.G, III.J, and III.O of Appendix R apply to the Farley Nuclear Plant."

The basis for the statement of the March 19, 1981 letter is 10CFR50.48(b) which states as follows:

"Except for the requirements of Sections III.G, III.J and III.O, the provisions of Appendix R to this part [10CFR50] shall not be applicable to nuclear power plants licensed to operate prior to January 1, 1979, to the extent that fire protection features proposed or implemented by the licensee have been accepted by the NRC staff as satisfying the provisions of Appendix A to Branch Technical Position BTP APCSB 9.5-1 reflected in staff fire protection safety evaluation reports issued prior to the effective date of this rule [February 17, 1981]. . ."

The NRC's Joseph M. Farley Safety Evaluation Report, Fire Protection Review, Units 1 and 2, dated February 12, 1979 states,

"Since Unit Nos. 1 and 2 are of the same design, except where noted, all comments made in this report apply to both units."; additionally, "In summary, the Fire Protection Program for the Farley Nuclear Plant with the improvements already made, is adequate for the present time and, with the scheduled modifications, will meet the guidelines contained in Appendix A to BTP ASB 9.5-1."

The Fire Protection Program for Farley Nuclear Plant Units 1 and 2 satisfies the provisions of Appendix A to Branch Technical Position BTP APCSB 9.5-1 and was accepted by the NRC staff in a safety evaluation report issued prior to the effective date of 10CFR50.48 and Appendix R; therefore, the exclusion for implementing certain provisions of Appendix R as specified by 10CFR50.48(b) is extended to Farley Nuclear Plant Units 1 and 2.

Farley Nuclear Plant Units 1 and 2 received operating licenses on June 25, 1977 and March 31, 1981, respectively. Although Unit 2 was licensed after January 1, 1979, the exclusion for implementing certain provisions of Appendix R as specified in 10CFR50.48(b) is applicable to Unit 2 as stated in the aforementioned March 19, 1981 letter. This is supported by the NRC's Safety Evaluation Report for Farley Nuclear Plant Unit 2, Supplement 5, dated March 1981, which states:

"On October 27, 1980, the Commission approved for publication in the Federal Register a new §50.48 and Appendix R to 10 CFR Part 50 delineating certain fire protection provisions for nuclear power plants licensed to operate prior to January 1, 1979. By letter dated December 8, 1980, the licensee committed to implement in Unit 2 any modifications required for Farley Unit 1 for the following three issues identified in Appendix R as items to be backfitted.

1. Section III.G, Fire Protection of Safe Shutdown Capability
2. Section III.J, Emergency Lighting
3. Section III.O, Oil Collection System for Reactor Coolant Pumps

"The implemented schedule will be in accordance with the requirements of the rule.

"Based on these commitments and our [NRC staff] evaluation, we conclude that Farley Unit 2 fire protection program will meet all the requirements of Appendix R to 10 CFR Part 50 when the committed modifications have been completed, meets the requirements of General Design Criterion 3, and therefore is acceptable."

Therefore, the position of Alabama Power Company is that only Sections III.G, III.J and III.O of Appendix R apply to Farley Nuclear Plant Units 1 and 2. The obligatory compliance by Farley Nuclear Plant Units 1 and 2 of any Appendix R provisions, other than Sections III.G, III.J and III.O, is outside the scope of the present Farley Nuclear Plant fire protection program and the Branch Technical Position BTP APCSB 9.5-1 and is therefore not justified.

Annual Physical Qualification

As discussed, the present Farley Nuclear Plant Fire Protection Program satisfies the provisions of Appendix A to Branch Technical Position BTP APCSB 9.5-1 and associated supplemental guidance and provides adequate guidance to ensure that fire brigade members are physically qualified to fulfill their responsibilities. As

supplemental guidance to Branch Technical Position BTP APCSB 9.5-1, the NRC issued "Nuclear Plant Fire Protection Functional Responsibilities, Administrative Control and Quality Assurance", dated August 29, 1977, which provides that fire brigade members participate in annual practice sessions under strenuous conditions and their qualifications "should include satisfactory completion of a physical examination for performing strenuous activity".

All Farley Nuclear Plant fire brigade members participate in annual practice sessions using fire fighting equipment and emergency breathing apparatus. These practice sessions are conducted under the strenuous conditions involving an actual fire that could occur at a nuclear power plant and include fire fighting in enclosed spaces, agility in protective clothing, manipulating fire fighting equipment, wearing emergency breathing apparatus, and demonstration of the physical capacity and stamina to perform fire fighting activities. Fire brigade members are drilled and evaluated individually and as a team. Members have been removed from the fire brigade when satisfactory completion of the practice session was not demonstrated due to lack of physical capability.

Alabama Power Company has demonstrated compliance with the supplemental guidance dated August 29, 1977, and thereby Branch Technical Position BTP APCSB 9.5-1, by the Farley Nuclear Plant Fire Protection Program Reevaluation (FPPR), dated September 1977. FPPR Amendment 3, Question 53, dated October 1978, identifies pertinent Farley Nuclear Plant procedures and provides a point-by-point response to the provisions of the supplemental guidance. It is the opinion of Alabama Power Company that these annual practice sessions at Farley Nuclear Plant sufficiently examine and demonstrate the physical capabilities of fire brigade members to perform strenuous fire fighting activities and therefore satisfies the supplemental guidance and Branch Technical Position BTP APCSB 9.5-1.

As a supplement to the information previously provided in letter of December 21, 1982, Alabama Power Company provides a medical screening of fire brigade members in addition to physical examination provided by practice sessions. All fire brigade members must satisfactorily complete a pulmonary examination in order to qualify for the use of emergency breathing apparatus and fire brigade membership. Moreover, the medical fitness of fire brigade members, and all other employees, is addressed by an Alabama Power Company management procedure. Alabama Power Company provides all employees, including fire brigade members, a cost-free medical examination by a qualified physician. This medical examination is optional to all employees, except security members who must satisfactorily complete an annual medical examination. Employees over the age of thirty-five are formally notified during

the month of their birth of the Alabama Power Company policy regarding medical fitness and requested to complete a cost-free medical examination. Furthermore, all security members, including those of the fire brigade, successfully complete an annual physical fitness test which demonstrates the most physically demanding day-to-day and contingency situations that may be encountered during job performance in accordance with 10CFR50.73, Appendix B. It is the position of Alabama Power Company that the current use of this medical screening provides a supplement to the practice sessions such that the Farley Nuclear Plant fire brigade members are physically qualified to perform strenuous fire fighting activities.

Use of Open Flame Permits

Farley Nuclear Plant Fire Protection Program Reevaluation, Amendment 3, Question 53, Attachment 4, provides a point-by-point response to the provisions of supplemental guidance dated August 29, 1977. The response to the provisions for a work permit to control ignition sources is outlined in Alabama Power Company administrative procedure FNP-O-AP-38, Use of Open Flame, which provides for supervisory approval of an open flame permit.

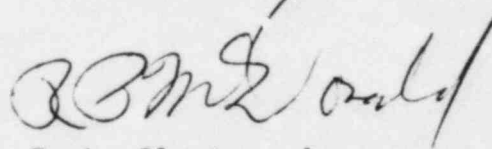
At Farley Nuclear Plant, the Group Foreman who assumes responsibility for the work requiring a flame permit and the Shift Foreman are responsible to authorize the use of open flame permits. Shift Foremen are trained in fire protection measures in accordance with the Farley Nuclear Plant Fire Protection Program. When the reactor is critical, the use of an open flame permit will not be approved in the Auxiliary Building Battery Rooms, Auxiliary Building Battery Switchgear Rooms, Main Control Room or the Cable Spreading Room unless absolutely essential. An open flame permit is approved for the expected duration of the work. The Group Foreman is responsible for the daily supervision and periodic checks of work activity, compliance with open flame permit provisions and the handling and operation of cutting and welding equipment. The Group Foreman will ensure that proper fire fighting equipment is available, combustibles are removed or shielded from ignition sources, and fire watches are posted in safety related areas or areas containing combustibles. Fire watches have no other duty. A final inspection of the area is made within approximately one-half an hour after the use of an open flame permit has terminated.

As previously discussed, the NRC Staff Safety Evaluation Report, dated February 12, 1979, has determined that the present Farley Nuclear Plant Fire Protection Program satisfies the provisions of Appendix A to Branch Technical Position BTP APCSB 9.5-1. It is the opinion of Alabama Power Company that the present open flame permit system is adequate to minimize the potential of a fire from the use of ignition sources and that the imposition of the provisions of Appendix R, Section III.K at Farley Nuclear Plant is not justified.

Conclusion

The Fire Protection Program for Farley Nuclear Plant Units 1 and 2 satisfies the provisions of Appendix A to Branch Technical Position BTP APCSB 9.5-1 and was so accepted by the NRC Staff in a safety evaluation report issued prior to the effective date of 10CFR50.48 and Appendix R. In accordance with 10CFR50.48(b), only Sections III.G, III.J and III.O of Appendix R apply to Farley Nuclear Plant. It is the position of Alabama Power Company that the imposition of fire protection requirements other than that of BTP APSCB 9.5-1, associated supplemental guidance and any Appendix R sections other than Sections III.G, III.J and III.O is not justified and would not significantly contribute to improved fire protective safety at Farley Nuclear Plant. Therefore, Alabama Power Company requests that the two open items regarding physical examinations and fire prevention procedures be closed and removed from the subject SALP Assessment.

Yours very truly,



F. L. Clayton, Jr.

FLCJr/MAL:mjh-D37

cc: Mr. R. A. Thomas
Mr. G. F. Trowbridge
Mr. S. A. Varga
Mr. E. A. Reeves
Mr. W. H. Bradford