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June 17, 1983

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
Inaccessible Hydraulic Snubber Visual Inspection
One-Time Change to Technical Specification 4.7.9

Gentlemen:

During the fourth refueling outage of Unit 1, Alabama Power Company conducted a visual inspection of inaccessible hydraulic snubbers pursuant to Technical Specification 4.7.9. This inspection resulted in two snubbers, CVC-R451 and MS5-R16B, being declared inoperable. The causes of snubber inoperability were identified and the snubbers were repaired and retested satisfactorily. Technical Specification 4.7.9 requires a subsequent visual inspection to be conducted within 6 months + 25% when two snubbers are declared inoperable. Using this criteria, a subsequent visual inspection must be performed by November 1, 1983. In order to inspect inaccessible snubbers the plant must be taken to cold shutdown, requiring an outage of approximately five days. Based on an average capacity factor of 85% for Farley Unit 2, the second refueling outage would occur during the time that the Unit 1 snubber inspection is required, such that a simultaneous shutdown of both units could occur which would cause significant scheduling and manpower problems. Alabama Power Company respectfully requests a one-time change to Technical Specification 4.7.9 which would permit the extension of the subsequent visual inspection of inaccessible hydraulic snubbers to the fifth refueling outage or the next plant shutdown of sufficient duration. The fifth refueling outage is scheduled to take place on or about January 24, 1984, assuming 100% fuel burn, resulting in an extension of approximately 3 months to the subsequent visual inspection. Such an extension would prevent a plant shutdown for the sole purpose of surveillance inspection and possible simultaneous shutdown of both units.

It is the judgement of Alabama Power Company that a visual inspection of inaccessible hydraulic snubbers prior to the shutdown for the fifth refueling outage would create significant economic burden by requiring a forced outage for the sole purpose of snubber inspections without concurrent safety benefits. Previous inspections have been

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conducted to verify snubber operability at each refueling. The maximum number of inoperable snubbers identified at any inspection has been 1 or 2, with several inspections identifying no inoperable snubbers. The inoperable snubbers identified during this inspection had extenuating circumstances (loss of fluid by personnel error during inspection on one snubber and mechanical interference on another snubber) with no evidence of identified generic failure mechanisms. Previous engineering analysis/review has shown that the failure of a single support on a seismic line would not adversely affect the capability of the line to withstand a seismic event (due to design conservatism). Based on the above, Alabama Power Company concludes that this one-time requested delay, of approximately three months, of the visual inspection of hydraulic snubbers will not adversely affect the reliability of the seismic piping systems.

The proposed extension of the visual inspection of inaccessible hydraulic snubbers is of such short duration (three months) that it does not represent a significant hazards consideration, as defined in 10 CFR 50.92, and does not jeopardize the safe operation of the Farley Nuclear Plant - Unit 1. The Plant Operations Review Committee has reviewed this one-time technical specification change. The Nuclear Operations Review Board will review this change at a future meeting.

A visual inspection of inaccessible hydraulic snubbers is required not later than November 1, 1983 under the existing technical specification. Alabama Power Company therefore requests approval of this one-time change to Technical Specification 4.7.9 by October 1, 1983 to allow for planning and scheduling of the visual inspection.

This proposed amendment is designated as Class III for Unit 1 in accordance with 10 CFR 170.22 requirements. Enclosed is a check for \$4,000.00 to cover the total amount of fees required.

In accordance with 10 CFR 50.30(c)(1)(i), three (3) signed originals and forty (40) additional copies of the proposed change are enclosed.

Yours very truly,

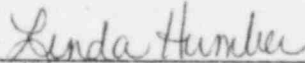

F. L. Clayton, Jr.

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Attachment

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

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 17th DAY OF June, 1983



Notary Public

My Commission Expires

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