

Mailing Address

Alabama Power Company
600 North 18th Street
Post Office Box 2641
Birmingham, Alabama 35291
Telephone 205 783-6081

F. L. Clayton, Jr.
Senior Vice President
Flintridge Building



Alabama Power
the southern electric system

July 8, 1983

Docket Nos. 50-348
50-364

Director, Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. S. A. Varga

Joseph M. Farley Nuclear Plant - Units 1 & 2
Pressure Isolation Valve (PIV)
Technical Specification Change Request

Gentlemen:

Alabama Power Company requested a permanent Technical Specification request related to leak-rate testing criteria on August 10, 1982. This request was submitted prior to the Unit 2 first refueling outage to ensure that this outage would not be extended due to the stringent test criteria of one gpm which could precipitate unnecessary valve repairs. Since the NRC could not complete the review of the permanent Technical Specification request prior to the Unit 2 first refueling outage, a one-time technical specification change was requested on October 11, 1982 to incorporate the Unit 1 test criteria into the Unit 2 Technical Specifications. The NRC granted this one-time request on November 24, 1982. Subsequently, on December 23, 1982, Alabama Power Company reiterated the request for approval of the August 10, 1982 Technical Specification change and requested approval by July 1, 1983 to support planning and scheduling for the Unit 2 second refueling outage.

In May 1983, from discussions with the NRC Staff, it was determined that NRC approval of this issue may not be received by July 1, 1983. During the week of June 26, 1983, the NRC Staff stated that the Unit 1 test criteria for Unit 2 would not be approved prior to the Unit 2 second refueling outage. The NRC requested clarification of the following issues regarding Alabama Power Company's August 10, 1982 letter:

8307150097 830708
PDR ADOCK 05000348
P PDR

Acc 1
1/1
Rec'd w/Heard
#4,000

- 1) applicability of paragraph 4.4.7.3.2 to Units 1 and 2.
- 2) finalization of the list of valves to be tested.
- 3) clarification of the test criteria for the Unit 2 second refueling outage.
- 4) determination of a significant hazards consideration.

Paragraph 4.4.7.3.2 is only applicable to Unit 1 and is requested to be deleted since ACTION statement 3.4.7.3 adequately addresses valve integrity by requiring valve and/or system integrity to be maintained/ isolated or the plant is to initiate an orderly shutdown within one hour. Furthermore, such valve leakage monitoring required by paragraph 4.4.7.3.2 could not be performed while the reactor is in operation or while the reactor coolant system is pressurized due to personnel safety considerations.

In concert with the PIV Technical Specification change, Alabama Power Company is currently reviewing the NRC safety evaluations related to the Farley Units 1 and 2 Inservice Testing (IST) program which requires testing of the subject valves. In conjunction with the review, Alabama Power Company will submit a proposed Technical Specification request recommending a consistent list of valves for both units to be leak-rate tested. This list would be identical to the IST program valves.

During the June 26, 1983 conversation, the NRC stated that the latest NRC Staff recommended leak-rate test criteria is scheduled for CRGR review. The CRGR review is not expected to be completed in time for approval of a revised leak-rate test criteria prior to the Unit 2 second refueling outage. A one-time Technical Specification change is therefore requested by August 15, 1983 to incorporate the allowable leakage rates described in the attached pages. It is requested that the NRC advise Alabama Power Company of the finalized leak-rate test criteria so that a permanent leak-rate criteria can be prepared for incorporation into the Unit 2 Technical Specifications.

Alabama Power Company has made the following determinations concerning this technical specification change request for a revised leak-rate test criteria (Unit 2) and deletion of paragraph 4.4.7.3.2 (Unit 1) as they relate to 10 CFR 50.91 and 50.92.

Unit 2 Leak Rate Test Criteria

Alabama Power Company has determined that this change request is consistent with Item (iv) of the "Examples of Amendments That Are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14870 of the April 6, 1983 issue of the Federal Register and that the proposed changes will not result in a

significant hazards consideration. In accordance with this example, the proposed relief can be granted based upon demonstration of acceptable operation from an operating restriction (one gpm criteria) that was imposed because acceptable operation was not previously demonstrated. The stringent leak-rate test criteria of one gpm was imposed on Alabama Power Company during the Unit 2 licensing process even though the Unit 1 leak-rate test criteria is one to five gpm. On no occasion has the Farley Nuclear Plant been required to shutdown due to excessive pressure isolation valve leakage. Actual leakage data was provided to the NRC as a part of Alabama Power Company's October 11, 1982 letter. This data demonstrated that, for valves which failed the one gpm criteria and for those that failed the one to five gpm leak-rate criteria, no discernable differences in seating surfaces could be found, and no evidence of impending valve failures were found in any of the valves that failed either criterion. It is also noted that during the last Unit 2 outage, 27 of 35 valves had zero gpm leakage. In addition, the preliminary results of the NRC consultant's (EG&G of Idaho) study for the NRC Office of Research, indicate that the NRC Staff should consider allowing leak rates in excess of 1 gpm, particularly for larger valves. Therefore, the operating restriction and the criteria to be applied in this proposed relief have been established in a review and have been justified in a satisfactory way such that the criteria have been met.

Deletion of Unit 1 Paragraph 4.4.7.3.2

This change request is consistent with Item (i) of the "Examples of Amendments That Are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14870 of the April 6, 1983 issue of the Federal Register, and the proposed changes will not result in a significant hazards consideration. Deletion of this paragraph is purely an administrative change to achieve consistency throughout the Technical Specifications in that the requirements of ACTION statement 3.4.7.3 adequately address valve integrity by requiring valve and/or system integrity to be maintained/isolated or the plant is to initiate an orderly shutdown within one hour.

Alabama Power Company has reviewed these proposed changes and considers them not to involve significant hazards considerations because they do not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety.

In conclusion, the NRC issues discussed during the week of June 26, 1983 have been addressed above. Specifically, Alabama Power Company requests a one-time Technical Specification change for the Unit 2 leak-rate test criteria, as described in the attached pages, by August 15, 1983. In

Mr. S. A. Varga
U. S. Nuclear Regulatory Commission

July 8, 1983
Page 4

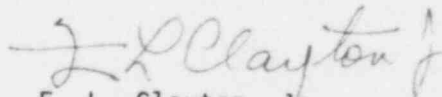
addition, a recommended list of valves to be leak-rate tested as a part of the PIV program will be submitted for NRC approval. Following finalization of the leak-rate test criteria, the NRC is requested to advise Alabama Power Company of the revised criteria.

The Plant Operations Review Committee has reviewed this proposed change and the Nuclear Operations Review Board will review this change at a future meeting. As noted by the distribution, a copy of this proposed license amendment is being sent to the Alabama State Designee in accordance with 10 CFR 50.91(b)(1). This proposed one-time amendment is designated as Class III for Unit 2. Enclosed is a check for \$4,000.00 to cover the total amount of fees required. Deletion of paragraph 4.4.7.3.2 is considered a supplement to the August 10, 1982 permanent Technical Specification change submittal for Units 1 and 2. A check for \$4,400.00 was provided at that time.

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

If you have any questions, please advise.

Yours very truly,

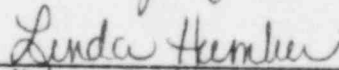

F. L. Clayton, Jr.

FLCJr/BDM:1sh-D28

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 8th DAY OF July, 1983


Notary Public

My Commission Expires: 1-10-87