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April 5, 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 and 2
Technical Specification Surveillance Requirements

Gentlemen:

Alabama Power Company is currently operating the Joseph M. Farley Nuclear Plant - Units 1 and 2 on standard 12-month fuel cycles. The corresponding technical specification surveillance requirements for refueling outage related surveillance are mainly based on 18-month intervals. This interval allows sufficient time for completing surveillance requirements due to the 6-month contingency allowance that is included in the technical specifications.

Alabama Power Company plans to implement 18-month fuel cycles beginning with Cycle 3 at Unit 2 and Cycle 6 at Unit 1. In order to maintain the 6-month contingency period that currently exists in the technical specifications, the surveillance interval requirements for the 12-month fuel cycles must be extended for the 18-month fuel cycles. The surveillance activities that are performed during a refueling outage consist of those activities that can only be performed when the plant is in a shutdown condition and other activities scheduled for a refueling outage in order to maximize surveillance testing efficiency. As shown in Attachment 1, this change to the technical specifications is justified from an operability standpoint and a reliability standpoint. No exemption or change to the technical requirements (i.e., setpoints, safety limits, etc.) is involved in this proposed technical specification change.

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w/check: \$4400.00

The proposed changes to the Joseph M. Farley Technical Specifications are included as Attachment 2. These proposed changes will allow continued operation of the plant and the necessary compatibility between the fuel cycles and surveillance intervals. Additionally, these changes should be considered for other proposed technical specification amendments that are currently being evaluated by the NRC.

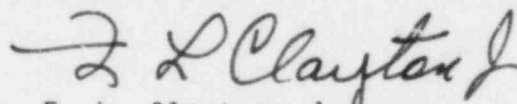
Alabama Power Company requests approval of the proposed technical specification changes by October 1, 1983, to support the planning and scheduling of surveillance testing for Cycle 3 at Unit 2, the initial 18-month fuel cycle for the Joseph M. Farley Nuclear Plant.

Alabama Power Company's Plant Operations Review Committee has reviewed this proposed change to the Technical Specifications and has determined that no unreviewed safety question is involved as shown in Attachment 1. The Nuclear Operations Review Board will review this change at a future meeting.

The class of this proposed change is designed as Class III for Unit 1 and Class I for Unit 2 in accordance with 10CFR170.22 requirements. Enclosed is a check for \$4,400 for the total amount of fees required.

In accordance with 10CFR50.30(c)(1)(i), three signed originals and forty (40) additional copies of this proposed change are enclosed.

Yours very truly,


F. L. Clayton, Jr.

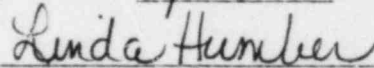
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Attachments

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

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 5th DAY OF April, 1983.


Notary Public

My Commission Expires:

1-10-87

ATTACHMENT 1

Safety Evaluation for the Proposed Changes to The Technical Specification Surveillance Requirements for the Joseph M. Farley Nuclear Plant - Units 1 and 2

BACKGROUND:

Alabama Power Company is currently operating Joseph M. Farley Nuclear Plant - Units 1 and 2 on 12-month fuel cycles. The technical specification surveillance requirements for the 12-month fuel cycles are based on 18-month intervals which include a 6-month contingency period to perform outage related surveillance. The surveillance activities that are performed during a refueling outage consist of those activities that can only be performed when the plant is in a shutdown condition and other activities scheduled for a refueling outage in order to maximize surveillance testing efficiency. The 6-month contingency period is extremely important because it includes an allowance for time lost due to unscheduled or forced outages during normal cycle operation, which in turn permits the required surveillance to be performed without implementing surveillance extension provisions, requiring emergency technical specification relief, or requiring plant shutdown. Commencing with the Unit 2 Cycle 3 and Unit 1 Cycle 6 fuel reloads, Alabama Power Company plans to implement 18-month fuel cycles. Thus, Alabama Power Company proposes to amend the technical specification surveillance requirements in order to maintain the same contingency period for 18-month fuel cycles that currently exists for the 12-month fuel cycles.

REFERENCES:

- (1) Joseph M. Farley Nuclear Plant - Unit 1 Technical Specifications
- (2) Joseph M. Farley Nuclear Plant - Unit 2 Technical Specifications

BASES:

Two principal considerations are involved in this proposed technical specification change. These considerations are: (1) the 6-month contingency period for completing the technical specification surveillance requirements, and (2) the potential impact on equipment reliability associated with the extension of the surveillance interval.

The first principal consideration in this proposed technical specification change is the 6-month contingency period for completing the surveillance requirements. The current surveillance requirements that exist in the technical specifications are to be performed within the specified time interval with the maximum allowable extension not to exceed 25% of the surveillance interval, and the combined time interval for any three consecutive surveillance intervals not to exceed 3.25 times the specified time interval. Since the 12-month fuel cycles have 18-month surveillance intervals, a 6-month contingency period exists to

perform the required surveillance without implementing the surveillance extension provisions listed above. Considering that this 6-month period exists to perform all required refueling outage related surveillance, the extension conditions are reasonable. However, when the fuel cycles are extended to 18 months, the 6-month contingency period is completely eliminated; and the extension provisions become the only allowance available for completing required surveillance activities without imposing a limiting condition of operation (LCO). Thus, operation in accordance with these requirements becomes excessively restrictive. The 6-month contingency period is necessary for proper operation of the plant. Without this operational margin, Alabama Power Company would inevitably be forced to meet the surveillance requirements by one or more of the following:

- (1) Implementing the 3.25 extension provision,
- (2) Requesting an emergency technical specification change based on impending plant shutdown for the sole purpose of complying with surveillance requirements, or
- (3) Shutting down the plant for the sole purpose of surveillance. It is Alabama Power Company's understanding that such a shutdown is contrary to NRC policy.

Alabama Power Company considers the above alternatives to be excessively restrictive and undesirable. A 6-month contingency period for completing surveillance exists now and has proven to be adequate for the current 12-month fuel cycles. Likewise, a 6-month contingency period should continue to exist when the fuel cycle is converted to 18 months.

The second principal consideration for this technical specification change is the potential impact on equipment reliability due to the extension of the surveillance interval. Plant operational experience at the Joseph M. Farley Nuclear Plant for equipment associated with this technical specification change has demonstrated that the equipment is highly reliable. For example, instrumentation channel checks and channel functional tests are performed weekly and monthly on much of this equipment. Plant records of these checks and tests have demonstrated the reliability of these instruments. Although surveillance testing during shutdown has shown instrumentation drift to be present, recalibration of this instrumentation has demonstrated that the drift is not significant and that drift during the extended surveillance intervals would remain within acceptable limits. Additionally, the lack of significant irregularities in all equipment-related surveillance testing indicates the dependability of nuclear grade components. Consequently, extension of the surveillance interval from 18 months to 24 months will not result in a significant decrease in equipment reliability.

Thus, Alabama Power Company proposes that the 18-month technical specification surveillance intervals be amended to 24-month intervals and 12-month intervals be amended to 18-month intervals. The proposed technical specification changes are provided as Attachment 2.

CONCLUSIONS:

The proposed amendments to the Farley Technical Specifications - Units 1 and 2 do not involve an unreviewed safety question as defined by 10CFR50.59. Additionally, the changes will not affect the safe operation of either Unit 1 or Unit 2 of the Joseph M. Farley Nuclear Plant.