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April 23, 1991

Docket Nos. 50-348
50-364

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

Joseph M. Farley Nuclear Plant
NRC Inspection Report Nos. 50-348/90-35 and 50-364/90-35

Gentlemen:

By letter dated March 8, 1991, the NRC forwarded the results of the Systematic Assessment of Licensee Performance (SALP) Board evaluation of Farley Nuclear Plant for the period of August 1, 1989 through December 31, 1990. Attachment 1 provides Alabama Power Company's comments on errors and misconceptions contained in the SALP report. Attachment 2 lists several suggested editorial corrections to the SALP report. In addition, Alabama Power Company has the following general comments about the SALP process and the allocation of NRC resources.

Although the report is primarily positive in its findings, portions of the report appear to be more of a subjective appraisal and less of an objective assessment of plant performance. Unlike the normal regulatory process, the SALP process does not appear to apply the standardized review criteria objectively and uniformly as is necessary to provide meaningful feedback.

Alabama Power Company is concerned with the NRC's policy of publicly issuing the SALP Board's report without first affording the licensee the opportunity to comment and identify errors and misconceptions. Normally, the utility has an opportunity to review with the NRC their preliminary inspection findings and conclusions prior to issuance of a report. In this manner, any errors or misconceptions can be corrected before the information is approved by the Regional Administrator, then made public and widely disseminated. However, the SALP process does not follow this course and we do not know of any case in which ratings have been changed after having been made public.

For the previous SALP period Farley Nuclear Plant received five level one's and two level two's for performance. During the following eighteen-month period Farley Nuclear Plant received forty-two routine inspections and nine special inspections by the NRC. This level of attention does not seem consistent with the assessments of the SALP which supports reduced NRC attention in the majority of the functional areas.

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Alabama Power Company appreciates the opportunity to provide comments on the SALP report and requests that these comments be considered in the NRC's final conclusion.

If you have any questions, please advise.

Respectfully submitted,

ALABAMA POWER COMPANY

J. D. Woodard

JDW/BHW:map 0047

Attachments 1, 2

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

Attachment 1

Comments on the NRC SALP Report 90-35

No.	Reference	Comment
1.	Cover letter	In paragraph 3 the example of instrumentation for detection of fuel failure is apparently referring to the N-16 steam generator leak detection monitor. This device is not used to detect fuel failure but instead provides early indication of a possible steam generator tube failure. (See page 17, IV.G.1.)
2.	Page 5 (IV.A.1)	The report states that FNP continues to experience fire header leaks due to pipe corrosion. These leaks have primarily occurred at mechanical joints and to a limited degree imperfections in the pipe, but to date we have not experienced a trend of leakage due to corrosion.
3.	Page 6 (IV.B.1)	The report notes that the 1990 goal for collective dose of 450 person-rem was exceeded with a total of 512 person-rem. The actual collective dose for 1990 was 457 person-rem.
4.	Page 11 (IV.D.1)	The report notes that a telecopy system to offsite authorities has been added during the SALP period. This system has been in place for several years. However, an automatic hard-copy offsite communication system (HOCS) which provides simultaneous computer printout capability for offsite agencies was installed during this SALP period.
5.	Page 13 (IV.E.1)	The SALP report states that a Security Incident Report was not initiated following a one-hour notification associated with the discovery of a water pipe that could have allowed access to the Protected Area. Although a Security Incident Report was not initially completed, an LER was submitted to the NRC reporting the event and all of the required corrective actions were accomplished. APCo would categorize this as a documentation problem and not an indication of a security weakness worth mentioning in the SALP report. The SALP report points out that the rewrite of the Security Plan had to be returned for reformatting and clarification. The format changes, changes in clarity and changes to commitments did not result in any physical changes to our security program, only to the

5. (cont'd)

wording and format of the plan. The rewrite of the Security Plan was developed, revieved and approved by the Plant Operating Review Committee and was clearly understood by site personnel. APCo made clarification changes so that the rewrite was better understood by the NRC staff. APCo does not believe this comment warrants mentioning in the SALP report.

The SALP report makes the following statement concerning the security modifications: "Inadequate licensee oversight of the contractor work in design and installation of the system upgrades were a factor in the delay of the completion date." APCo management involvement in the security system modification had been active and ongoing. The design for the security upgrade was reviewed by plant management and enhancements were made as a result. Although it is true that problems existed after installation, APCo does not agree with the SALP assessment that attributes the problem to inadequate APCo oversight of its designers and contractors. This SALP report comment is the first indication of the NRC's concern with a lack of security contractor oversight by APCo management.

6. Page 14 (IV.F.1)

The report cites problems with the security modification design process as an example of an engineering design deficiency. This comment implies that reasonable engineering should have identified deficiencies in the design of the modification prior to its installation. APCo disagrees with this supposition. Furthermore, the deficiencies referred to arise in large part from Staff positions which are not apparent from the wording of the regulations. This was discussed with the Staff in a meeting August 2, 1990. After clarification of the Staff positions, APCo revised the security system design to comply. This issue was also included in the Security and Safeguard section, and as such APCo is being impacted twice by the same issue.

The SALP report also cites, "inadequate design review to identify improper AFW and CCW bearing alarm setpoints..." as an example of an engineering design deficiency. This comment is in reference to a March 2, 1990 NRC Inspection Report that noted during a review of the Unit 1 control room annunciator alarm panels that the bearing alarm setpoints were 10 degrees higher than the manufacturer's recommended maximum

6. (cont'd)

safe operation temperature. Plant drawings listed the alarm setpoint as 200 degrees while the manufacturer's recommended safe temperature was 190 degrees. A minor departure, which was later followed by a plant design change, was written to change the alarm setpoint to 185 degrees. The NRC concluded in their inspection report that failure to include the correct alarm setpoint on the "as-built" drawings was a design error; however, no violation was issued due to its low safety significance. APCo disagrees with the NRC's conclusion that this incident is evidence of a weakness in the design engineering process. The alarm setpoints and associated drawings were established with the original plant design and therefore do not reflect performance of engineering during the subject SALP period. Furthermore, this example is not repetitive and not indicative of programmatic breakdown. Corrective action taken was prompt and effective. As such, this example seems to fit the criteria for Category 1 performance defined in the NRC Manual and should not serve to support Category 2 performance.

7. Page 18 (IV.G.1)

The report states that the leak-before-break (LBB) scoping analysis submitted in support of the steam generator tube plugging technical specification request lacked sufficient detail for the NRC to perform a review even though previous discussions indicated the level of detail required. This assertion is not consistent with APCo's understanding of the circumstances. In discussions with the NRC in November 1990, APCo proposed to submit a scoping analysis for LBB in order to speed the NRC review of the steam generator tube plugging technical specification change. (The detailed LBB analysis was to be submitted at a later date, i.e., January 1991.) APCo subsequently provided the detailed LBB analysis by letter dated January 28, 1991. APCo believes it acted responsibly by attempting to address the issue of collapsed steam generator tubes. Similar technical specification changes had been previously granted to other utilities without identifying this issue. APCo aggressively handled this matter in a spirit of cooperation with the NRC.

Attachment 2

Suggested Corrections to the NRC SALP Report 90-35

- Page 3, paragraph 7 is duplicated at the top of Page 4.

- Page 5, paragraph 3 of Section IV.B.1 states: "an exclusion area." In fact several exclusion areas have been enclosed by barriers. Paragraph 1 on Page 6 also indicates a single exclusion area.

- On Page 6, paragraph 4, line 5 should read "six new radiation protection staff positions were approved and filled... ."

- Page 7, paragraph 3, line 5 should be changed to read, "contaminated silica gel column..." versus "contaminated column... ."

- On Page 7, paragraph 4, line 1 the report notes a significant reduction in "dry" radioactive waste. The actual reduction in waste volume included "resins" as well as "dry" radioactive waste.

- The volume listed on Page 7, paragraph 4, line 4 should be changed from 3,000 cubic feet to 5,328 cubic feet.

- Page 7, paragraph 6, line 1 should read "counting room" versus "count room."

- Page 10, paragraph 5, line 1 should be changed to read, "During this assessment period..." rather than "Near the end of the assessment period... ."

- On Page 12, paragraph 3, line 3 the word "new" should be changed to "updated" when referring to the emergency response information brochure.

- On Page 13, the incident relating to an improper high flux trip setpoint actually occurred on Unit 2 and not Unit 1.

- On Page 13, the SALP report states, "an inspection conducted over four months later during this SALP period established that the licensee had failed to quantify the design deficiencies involved or initiate corrective actions." It should be clarified that this comment is only applicable to the high flux reactor trip setpoint error and not to the other examples of "design deficiencies" cited.

- On Page 19, paragraph 3 the SALP report indicates that Mr. W. G. Hairston, III was made Senior Vice President for Nuclear Operations in December 1989. Mr. Hairston was assigned this position in May 1988.