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



Docket No. 50-364

August 4, 1983

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

Attention: Mr. S. A. Varga

Joseph M. Farley Nuclear Plant - Unit 2
One-Time ISI Relief Request Supplement

Gentlemen:

In accordance with the requirements of 10 CFR 50.55a(g)(6)(i), Alabama Power Company hereby requests that one-time relief be granted from the schedular requirements of the 1974 Edition through the Summer 1975 Addenda of the ASME Code, Section XI (herein referenced as the Code), Article IWB-2411 for the inservice inspection of Item Numbers B1.3, B1.4, B1.6 and B1.9 of Table IWB-2600. A complete description of the affected components, existing examination requirements, bases of request for schedular relief, and proposed alternative examinations are described in Attachment 1.

Code Article IWB-2411 states, in part, that "at least 25% of the required examination shall have been completed by the expiration of one-third of the inspection interval (with credit for no more than 33% if additional examinations are completed) and at least 50% shall have been completed by the expiration of two-thirds of the inspection interval..." Farley Nuclear Plant Unit 2 began commercial operation on July 30, 1981; therefore, the first one-third of the inspection interval (first forty month inspection period) ends on November 30, 1984. The Unit 2 second refueling outage is currently scheduled to begin September 16, 1983. With the planned conversion to an 18 month fuel cycle, the third refueling is currently scheduled to begin during the period from January 31 to March 31, 1985 which will be from two to four months following expiration of the first forty month inspection period.

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Based on the current schedule, Alabama Power Company is required to complete all of the first inspection period ISI requirements for Unit 2 during the second refueling outage. These requirements include automated examination of the reactor vessel-to-flange weld, primary nozzle-to-vessel welds, nozzle inside radiused sections, nozzle-to-safe end welds and ligaments between threaded stud holes utilizing the Westinghouse remote inspection tool.

In April 1983, Alabama Power Company and Westinghouse began planning the Unit 2 ISI outage work, including the inspections requiring the Westinghouse remote inspection tool. Alabama Power Company formally notified Westinghouse by letter dated May 2, 1983 that their tool would be needed for the upcoming outage. Subsequently, several working meetings were held with Westinghouse wherein detailed ISI work plans and schedules for this work were developed. On August 1, 1983, Alabama Power Company management was notified by Westinghouse that they could not support the Unit 2 second refueling outage ISI work where use of the Westinghouse remote tool was required. These scheduler problems are due to other commitments (ten year inservice or preservice inspections) for examinations either in process or currently planned for three plants. These commitments are summarized as follows:

1. Westinghouse remote tool Number 2 is scheduled for use in performing the ten year inservice inspection of Palisades Plant from September 14 through September 28, 1983.
2. Westinghouse remote tool Number 3 is currently being utilized until September 5, 1983 to perform the Comanche Peak Unit 1 preservice inspection. Following return to Pittsburgh for required calibration, Westinghouse tool Number 3 will be utilized for the ten year inservice inspection of Zion Unit 1 from September 29 through October 12, 1983.
3. Westinghouse remote tool Number 1 has been removed from service and has not been refurbished and updated to meet the requirements of Regulatory Guide 1.150 Rev. 1.

The Westinghouse remote tool examination of Farley Nuclear Plant Unit 2 was scheduled from September 28 through October 10, 1983, which obviously conflicts with the other examinations scheduled. Since the other examinations involve preservice or ten year inservice inspections, Westinghouse considers these inspections to have higher priority over the forty month examination scheduled for Farley Nuclear Plant Unit 2. The Unit 2 second refueling outage

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is scheduled for a duration of approximately 40 days. Since the vessel examination requires critical path outage time, it cannot be delayed without a significant extension of the outage solely for the purpose of inspection. In addition, the Zion and Palisades ten year inspection schedules are potentially subject to significant extension due to the additional recording and sizing of indications which may be required.

Alabama Power Company has a ten year contract with Westinghouse for providing inservice inspection services. In attempting to fulfill this contract, Westinghouse has evaluated other alternatives, including subcontracting the examination. Due to the state of the art technology and tooling required, as well as the rapidly changing regulatory climate involved in reactor vessel examination, Westinghouse believes that it would not be in Alabama Power Company's best interest to subcontract the inspection work. Westinghouse feels that maintaining the work in house is essential to achieving a high level of confidence and consistency in conducting the vessel examinations.

Based on the above considerations, Alabama Power Company respectfully requests that a one-time relief be granted from the Code to allow the reactor vessel examinations required during the first forty month period to be deferred until the first outage of the second forty month period (third refueling outage). This would result in an extension of approximately four months into the second forty month period (44 months following commercial operation). This relief request is supplementary to our original ISI Program and relief requests submitted July 25, 1980 and subsequent relief requests submitted January 28, 1983. These previous submittals are currently under NRC review and scheduled for approval by September 1, 1983. The Unit 2 ISI Program is essentially identical to the Unit 1 ISI Program and relief requests which were granted by NRC letter of December 7, 1979.

The requirements specified in the latest NRC approved edition of ASME Section XI (1980 Edition through the Winter 1981 Addenda) supports Alabama Power Company's request for schedular relief. Article IWB-2412(a) and Table IWB-2412-1, Inspection Program B, define the first inspection period as being three calendar years of plant service (36 months). Article IWB-2412(b) states, in part, that "the inspection period specified in (a) above may be decreased or extended by as much as 1 year (12 months) to enable an inspection to coincide with a plant outage..." Therefore, the latest approved ASME Code would allow one inspection period to be increased up to 48 months during an interval. By deferring the inspections required during the first forty month period to the second forty month period, the Code requirements for both periods would be completed by one Westinghouse remote tool examination to be performed during the third refueling outage. The Unit 2 third refueling outage is scheduled to begin approximately 42 to 44 months following commercial operation.

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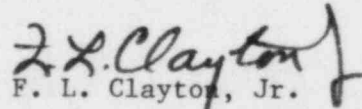
The Unit 2 vessel has been in service for approximately 1.7 effective full power years and was analyzed as a part of the Westinghouse Owners Group Pressurized Thermal Shock (PTS) review. The Westinghouse Owners Group has developed, and submitted for NRC consideration, conservative screening criteria to identify reactor vessel susceptibility to PTS. Using this screening criteria, Westinghouse's evaluation of the Farley reactor vessels described in WCAP-10019, "Summary Report on Reactor Vessel Integrity for Westinghouse Operating Plants" indicates that the Farley Unit 2 vessel is not expected to reach the screening criteria before end of plant life.

Westinghouse conducted the Farley Unit 2 preservice inspection in June 1980. The results of this examination produced five recordable indications which were evaluated and found to be within ASME Code acceptance limits for allowable indications, and no repairs were required. Only two of the five indications would be accessible for examination during the forty month inspection period. These indications, which were found by automatic scan using the Westinghouse remote tool, could not be verified by subsequent manual ultrasonic tool examination techniques. Details of this inspection are contained in Volume 4 of the Preservice Inspection Report transmitted by Alabama Power Company letter, dated December 1, 1982, to NRC Region II, with a copy to NRR.

In conclusion, Alabama Power Company respectfully requests that the one-time relief request be granted by September 1, 1983 to conduct the Unit 2 first inspection period reactor vessel examinations during the first outage of the second forty month period (third refueling outage). This would extend these examinations approximately four months beyond the end of the first forty month period. The forty and eighty month examination requirements will be completed during the third refueling outage. As discussed in Attachment 2, Westinghouse has guaranteed Alabama Power Company top priority for Westinghouse remote tool availability during the third refueling outage.

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

Yours truly,


F. L. Clayton, Jr.

STB:kc/D-317

Attachments

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

ATTACHMENT 1

ONE-TIME SCHEDULAR RELIEF REQUEST

COMPONENT:

CODE CLASS: 1

Reactor vessel-to-flange circumferential weld, reactor vessel primary nozzle-to-vessel welds, nozzle inside radiused sections, nozzle-to-safe end welds and ligaments between threaded stud holes (Item Numbers B1.3, B1.4, B1.6 and B1.9).

EXAMINATION REQUIREMENT:

At least 25% of the component volumetric examination shall have been completed by the expiration of one-third of the inspection interval, with credit for no more than 33 1/3% if additional examinations are completed.

BASIS FOR RELIEF:

Automated volumetric examinations of these components are conducted utilizing a remote inspection tool. Due to schedular conflicts, a tool is not available for use during the last Unit 2 outage of the first forty month inspection period (second refueling outage). Deferring these examinations up to four months beyond the first forty month period to the first outage of the second forty month period (third refueling outage) is consistent with the latest NRC approved edition of the ASME Code, Section XI (1980 Edition through the Winter 1981 Addenda) Articles IWB-2412(a) and (b). This later ASME Code allows an extension of up to 12 months for one inspection period per inspection interval.

ALTERNATIVE EXAMINATION:

The automated volumetric examination of Items B1.3, B1.4, B1.6 and B1.9 will be conducted, to the maximum extent allowed, during the first outage of the second forty month period (Unit 2 third refueling outage). This examination will complete all requirements for the first and second forty month periods where use of the remote tool is necessary.



ATTACHMENT 2

Westinghouse
Electric Corporation

Water Reactor
Divisions

Nuclear Services
Integration Division

Box 2728
Pittsburgh Pennsylvania 15230

IS-GCE-029
ALA-83-736

August 4, 1983

Mr. O. D. Kingsley
Manager of Nuclear Engineering and
Technical Support
Alabama Power Company
600 North Eighteenth Street
Birmingham, AL 35291

Dear Mr. Kingsley:

JOSEPH M. FARLEY NUCLEAR PLANT
UNIT NO. 2

Request for R. V. Examination Deferral

Per our communication of August 1, 1983, Westinghouse formally requests that the J. M. Farley Unit 2 Plant Reactor Vessel Inservice examination, scheduled to be performed during your upcoming outage in September of 1983, be deferred until the next plant refueling outage scheduled for late 1984 to early 1985. The reason for this request is based on a scheduler conflict regarding the allocation of our remote vessel examination tools for the performance of vessel examinations at various plants. Justification for this request is as follows:

I. Scheduled R. V. Examinations

A. Alabama Power Company, J. M. Farley Unit 2 Plant

Forty-month Inservice examination presently scheduled as follows:

- September 28, 1983: R.V. examination tool arrives on site and enters containment
- October 6, 1983: R.V. examination commences
- October 10, 1983: R.V. examination complete

Tool #2 is presently scheduled for use on this plant.

B. Texas Utilities Generating Company, Comanche Peak Unit 1 Plant

Preservice examination presently scheduled to commence on August 15, 1983. Time allocated for the examination - 21 days. Estimated completion by September 5, 1983. Due to a potential delay in the start day (possibly by two to three days) as well as the need for additional

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B. (cont'd)

time, in excess of the 21 days allocated, which could be caused by either additional indication mapping time, or other contingencies, this examination may require up to seven more days, bringing its completion to, or around September 12, 1983. Our uncontaminated Tool #3 is presently on site having just completed the Comanche Peak Unit 2 examination--it will also be used on Unit 1.

C. Consumers Power Company, Palisades Plant

Tenth year Inservice examination presently scheduled as follows:

- September 14, 1983: R.V. examination tool arrives on site
- September 16, 1983: R.V. examination commences
- September 28, 1983: R.V. examination complete

Only 12 days have been allocated for "on vessel time" and, again, potential exists for extension, especially if additional indication mapping time is experienced.

Our contaminated Tool #2 is presently assigned for this examination and being readied for field deployment.

D. Commonwealth Edison, Zion Unit 1 Plant

Tenth year Inservice examination presently scheduled as follows:

- September 29, 1983: R.V. examination tool arrives on site
- October 1, 1983: R.V. examination commences
- October 12, 1983: R.V. examination complete

Again, only 12 days have been allocated for this activity and potential for schedule extension exists for reasons similar to the ones delineated above in 1B and 1C.

Tool #3 is scheduled for this examination following completion of the Comanche Peak project. (Please refer to attached schedule of R.V. examinations of the plants discussed in 1A. through 1D. above.)

II. Schedular Conflict

Westinghouse currently owns only two remote R.V. examination tools, Tool #2 (contaminated) and Tool #3 (uncontaminated).

As discussed above, Tool #3 has been scheduled for the Comanche Peak Plant and the Zion Plant. Tool #2 has been scheduled for the Palisades Plant and the J. M. Farley Plant. The Zion Unit 1 R.V. examination is a tenth-year

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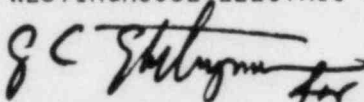
examination and cannot be deferred. With the Palisades examination scheduled for completion by September 28, 1983, without allowing any additional time for schedule extension due to mapping indications, etc., and the need for having the same tool (Tool #2) on site at the J. M. Farley Unit 2 Plant on the same day, September 28, 1983, obviously a conflict exists on the allocation of this tool. Unless the J. M. Farley R.V. examination is deferred until the late 1984 to early 1985 refueling outage, we will be running the risk of not being able to perform this examination, even if the 12-day schedule for the Palisades project is maintained without any extension.

Westinghouse would greatly appreciate your requesting this deferral from the U. S. Nuclear Regulatory Commission. Should this deferral be granted, the J. M. Farley Unit 2 40-month Inservice examination will be given the highest priority among other plants scheduled for future examination by Westinghouse.

Again, we appreciate Alabama Power Company's efforts and look forward to your response. Please feel free to contact us immediately if you need any additional information.

Very truly yours,

WESTINGHOUSE ELECTRIC CORPORATION

A handwritten signature in dark ink, appearing to read "J. C. Miller", with a stylized flourish at the end.

J. C. Miller, Manager
Operating Plant Projects, South

G. C. Efthymiou/mbs
Attachment

August 4, 1983

cc: R. P. McDonald, 1L
O. D. Kingsley, 1L, 1A
H. O. Thrash, 1L, 1A
W. G. Hairston, III, 1L
K. C. Gandhi, 1L, 1A
L. B. Long, 1L, 1A
J. R. Crane, 1L, 1A
R. H. Baulig, 1L, 1A (Farley Site)

| PROJECT | TIME ON R V | FORECAST | | | | TOOL USED |
|---------------------|----------------|---------------------|---------------------|---------------------|----------------------|--------------|
| | | REACTOR | VESSEL | TOOL | INSPECTION | |
| | | August | September | October | November | |
| Comanche Peak #1 | 21 DAYS | 8/15 <div></div> | 9/5 <div></div> | | | #3 |
| Palisades | 12 DAYS | | 9/14 <div></div> | 9/28 <div></div> | | #2 |
| Zion #1 | 12 DAYS | | | 9/29 <div></div> | 10/2 <div></div> | #3 |
| J. M. Farley #2 | 4 DAYS | | | 9/28 <div></div> | 10/10 <div></div> | #2 |