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Alabama Power  
the southern electric system

July 29, 1983

Docket Nos. 50-348  
50-364

Director of 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  
D.C. Distribution System Technical Specification 3/4.8.2

Gentlemen:

Alabama Power Company submitted proposed technical specification changes in letters dated February 1, 1983 and May 3, 1983 involving the D.C. distribution systems. The proposed changes updated the Auxiliary and Service Water Building D.C. Distribution System Technical Specifications to conform with the format of the most recent Westinghouse Standard Technical Specifications, current industry practice and Farley Nuclear Plant specific design parameters. During subsequent discussions with the NRC Staff, additional information was requested regarding the portion of the proposed changes involving discharge testing of the Service Water Building Batteries. The requested information is contained herein.

The Service Water Building Batteries are currently required to be subjected to performance discharge tests every 18 and 60 months while the plant is shutdown. Additionally, the Technical Specification Action statement requires that when one train of the D.C. distribution system is inoperable, the plant must be shutdown after 8 hours. Since the Service Water Building Battery System is shared between Units 1 and 2, the discharge test requirement necessitates a shutdown of both units. The proposed change includes a footnote to the ACTION statement to allow one D.C. distribution train to be inoperable during the battery discharge tests and to delete the requirement that the test be performed during shutdown.

During the discharge testing, one D.C. distribution train must be declared inoperable based on the technical specification definition of OPERABLE, i.e., the bus, battery bank and charger must meet the

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surveillance requirements in order to be OPERABLE. The discharge testing involves disconnecting the Service Water Building Batteries from the D.C. distribution system, and following testing, recharging the battery voltage to the surveillance requirement values. Although one train of the D.C. distribution system would be declared inoperable during the discharge testing, the train would be functional throughout the test since the battery charger would supply the D.C. loads while the batteries were disconnected. The battery charger would be supplied by off-site power during normal plant operation.

In case of a loss of off-site power event concurrent with the period of time that the batteries are disconnected for discharge testing, one train of the Service Water Building D.C. Distribution System would be operable with a battery, battery charger, and diesel generator back-up power source while the other train is not operable. The maximum period of time that such a condition would exist is 20 hours for each 18-month surveillance test and 30 hours for each 60-month surveillance test. The probability of a loss of off-site power event occurring during a 20-hour period that exists only once every 18 months or 30-hour period that exists only once every 60 months is extremely remote. The existing technical specification allows a period of up to 8 hours (2 hours inoperable and 6 additional hours to shutdown) for one train of the D.C. Distribution System to be inoperable (each occurrence). The proposed change is consistent with the philosophy of the existing technical specifications and would not significantly increase the probability of one train being inoperable concurrent with a loss of off-site power event but would delete the current requirement to simultaneously shutdown both units for the sole purpose of surveillance testing. This proposed change would not impact the continued safe operation of the Farley Nuclear Plant.

At the conclusion of the discharge test, the batteries would be reconnected to the D.C. distribution system and recharging would begin. A maximum of 24 hours would be required to restore the battery voltage to the minimum technical specification value; however, during the recharging portion of the test, the battery would be capable of automatically supplying D.C. power to both trains of essential loads during an accident situation.

The proposed change to allow Service Water Building Battery discharge testing without requiring both units to shutdown does not affect the continued safe operation of the Farley Nuclear Plant. The Service Water Building D.C. Distribution System would be functional and capable of supplying at least one train of essential loads during the period of time discharge testing was being performed and the batteries were being recharged.

The May 3, 1983 submittal did not include a significant hazards consideration since the NRC requirements for such a review was not in effect at that time. Subsequently, Alabama Power Company has evaluated the proposed changes and determined that a significant hazards consideration is not involved in accordance with 10 CFR 50.92. This determination is consistent with example (vi) 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. The proposed changes conform to the NRC approved Standard Review Plan and Westinghouse Standard Technical Specifications (NUREG-0452, Revision 4) which utilizes IEEE Standard 450-1980 as the basis for battery surveillance except for the following six minor plant-specific design differences.

1. The full charge specific gravity limits were adjusted to reflect the Farley Nuclear Plant specific battery design.
2. The voltage limits reflect the original Farley Nuclear Plant licensing basis.
3. A 24-hour period is allowed to correct temperature or connection resistance deviations without declaring the battery inoperable in accordance with IEEE Standard 450-1980.
4. Specific connection resistance values are defined for the connection resistance checks to reflect Farley Nuclear Plant specific design.
5. All battery charger test amperages and times are provided for completeness as the Standard Technical Specifications did not define these values.
6. Depressurization of the Reactor Coolant System through a vent is not applicable to the Farley Nuclear Plant design.

The May 3, 1983 submittal provides the detailed justification for the above six exemptions to the Standard Technical Specifications. These justifications show that the results of the proposed changes are within acceptable criteria with respect to the Standard Technical Specifications and/or IEEE 450-1980 and thus do not constitute a significant hazards consideration.

In accordance with Generic Letter 83-27 dated July 6, 1983, Alabama Power Company withdraws the portion of the May 3, 1983 proposed change involving increasing the 18-month surveillance intervals to 24 months. This issue has been addressed in the Generic Letter and the conclusion was that extending the 18-month surveillance intervals based on an 18-month fuel cycle is not acceptable to the NRC.

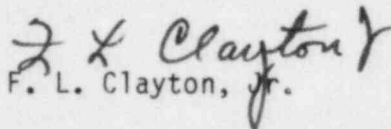
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This letter is a supplement to the Alabama Power Company letter dated May 3, 1983. The class of this proposed change was designated as Class III for Unit 1 and Class I for Unit 2 in accordance with 10 CFR 170.22 requirements. A check for \$4,400.00 to cover the total amount of fees required was enclosed with the May 3, 1983 letter. As noted by the distribution, a copy of this supplemental letter is being sent to the Alabama State Designee in accordance with 10 CFR 50.91(b)(1).

If you have any questions, please advise.

Yours very truly,

  
F. L. Clayton, Jr.

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