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F. L. Clayton, Jr.
Senior Vice President
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Docket No. 50-348



October 11, 1983

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

Attention: Mr. S. A. Varga

Joseph M. Farley Nuclear Plant - Unit 1
ISI and IST Requirements for the Fifth Refueling Outage

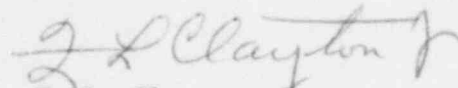
Gentlemen:

Your letter of September 16, 1983 requested that Alabama Power Company provide the most realistic schedule for the Inservice Inspection (ISI) and Testing (IST) items requiring NRC approval for the Farley Nuclear Plant Unit 1 fifth refueling outage. In response to this request, the attached describes each item, lists milestone dates and discusses impact upon the outage if NRC approval is not received. Details, including bases for the proposed changes, are described in Alabama Power Company submittals dated January 28, July 5, and September 27, 1983. These items, with one exception, have been previously approved or are not applicable to Unit 2.

Alabama Power Company respectfully requests that the NRC approve the proposed changes and revise the Unit 1 SER by January 1, 1984. The fifth refueling outage is scheduled to begin in the January/February, 1984 timeframe. This schedule would allow less than four weeks for procedural changes, outage planning and scheduling revisions.

Should any additional information be needed in support of your review, please advise.

Yours truly,


F. L. Clayton, Jr.

STB:kc/D-302

Attachment

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

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**UNIT 1 ISI/IST ITEMS REQUIRING NRC APPROVAL
FOR THE FIFTH REFUELING OUTAGE**

ISI/IST OPEN ITEMS	SUBMITTED BY APCO	CURRENT REQUESTED NRC APPROVAL DATE	UNIT 2 APPROVAL STATUS	DATE WHEN PLANT IMPACT OCCURS	COMMENTS
INSERVICE TESTING (IST) 1. Encapsulated Valve Position Indication Verification	7/5/83 (Att. 1, Item 2)	1/1/84 (9/1/83 Previ- ous Requested Date)	Approved 9/16/83	1/1/84	If relief for Unit 1 is not granted, encapsulation covers will have to be removed for valve position verification during the 5th refueling outage.
2. RWST Check Valve Stroke Test - Submittal of Additional Information	7/5/83 (Att. 1, Item 3)	1/1/84 (9/1/83 Previ- ous Requested Date)	Approved 9/16/83	1/1/84	NRC's letter of May 2, 1983 has granted limited relief but requested additional information by the start of the fifth refueling outage. APCO will be evaluating alternatives during the fifth refueling outage. By letter of 7/5/83, APCO requested that information be submitted prior to the end of the sixth refueling outage.
3. Accumulator Discharge Check Valve Stroke Test - Submittal of Additional Information	7/5/83 (Att. 1, Item 4)	1/1/84 (9/1/83 Previ- ous Requested Date)	Approved 9/16/83	1/1/84	NRC's letter of May 2, 1983 has granted limited relief but requested additional information by the start of the fifth refueling outage. APCO will be evaluating alternatives during the fifth refueling outage. By letter of 7/5/83, APCO requested that information be submitted prior to the end of the sixth refueling outage.

**UNIT 1 ISI/IST ITEMS REQUIRING NRC APPROVAL
FOR THE FIFTH REFUELING OUTAGE**

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ISI/IST OPEN ITEMS	SUBMITTED BY APCO	CURRENT REQUESTED NRC APPROVAL DATE	UNIT 2 APPROVAL STATUS	DATE WHEN PLANT IMPACT OCCURS	COMMENTS
4. Accumulator Discharge Check Valve Test Deferral	7/5/83 (Att. 1, Item 5)	1/1/84 (9/1/83 Previous Requested Date)	N/A	1/1/84	Limited relief for deferral of testing has already been granted as discussed in Item 3 above. These valves were included, due to editorial error, in the NRC SER summary list.
5. Pressure Isolation Valves	7/5/83 (Att. 1, Item 6) 9/27/83	1/1/84	Review Requested 9/27/83	1/1/84	If the NRC's SER is not revised to require testing of the 16 pressure isolation valves identified by APCO's 7/5/83 and 9/27/83 letters, 19 additional valves must be tested during the fifth refueling outage.
6. Instrument Air Check Valve Position Verification	7/5/83 (Att. 1, Item 7)	1/1/84 (9/1/83 Previous Requested Date)	N/A Due to Difference in Design	1/1/84	This requirement to verify valve position cannot be complied with, since there is no method to physically verify valve position during normal operation.
7. Diesel Generator Check Valve Tests	7/5/83 (Att. 1, Item 8)	1/1/84 (9/1/83 Previous Requested Date)	Relief Granted 4/8/83	1/1/84	Failure to revise the NRC's SER to allow this test to be conducted in accordance with commitments made in APCO's letter of 6/10/83 will require APCO to conduct burdensome inspections in excess of the commitments made related to IE Bulletin 83-03. It is the interpretation of APCO that Section 1.3 of the 4/8/83 NRC SER grants requested relief for for Unit 2.
INSERVICE INSPECTIONS (ISI) 1. Hydro Test Relief Requests	1/28/83	1/1/84 (9/1/83 Previous Requested Date)	Relief Granted 9/22/83	1/1/84	Certain Code requirements are impractical and cannot be complied with unless relief is granted.