

UNNRC REGION 1
ATLANTA, GEORGIA

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Alabama Power
the southern electric system

P.O. Drawer 470
Ashford, AL 36312
FNP-83-0180
February 16, 1983

Mr. J. P. O'Reilly, Director
U. S. Nuclear Regulatory Commission
101 Marietta Street, N.W.
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

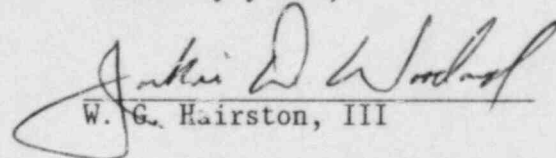
This is to confirm the telephone call to Mr. F. Cantrall (NRC) at approximately 1325 on February 16, 1983 by Mr. J. D. Woodard (APCo) in accordance with Tech. Spec. 6.9.1.12.b.

At 1700 on 2/15/83, it was determined that both trains of the Control Room filtration unit and the "A" train Penetration Room Filtration System had previously failed to meet Tech. Spec. criteria for carbon efficiency due to a possible misinterpretation of Regulatory Guide 1.52. The assigned activated carbon decontamination criteria of 95% had been used in the analyses of test samples of used activated charcoal instead of the laboratory test criteria of 99% as indicated in table 2 of Regulatory Guide 1.52. New activated charcoal had always been tested to the 99% criteria.

During the week of January 31st, while reviewing a draft Tech. Spec. revision, the possibility of a misinterpretation of the regulatory guide requirements was discovered. Rather than waiting for an evaluation to be completed, the Unit 1 "A" train Penetration Room Filtration System and the "A" train Control Room Filtration Unit filters were replaced as a precautionary measure on 2/5/83 and tested satisfactorily.

A summary of past test results is illustrated in the attachment. Further details will be provided in a followup report.

Sincerely yours,


W. G. Hairston, III

WGH/RWO:sjp

cc: H. O. Thrash
R. G. Berryhill
W. G. Ware
L. S. Williams
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ATTACHMENT 1

SUMMARY OF TEST DATA POSSIBLY MISINTERPRETED BY REGULATORY GUIDE 1.52

		Methyl Iodide Test	Freon Test	Comments
Unit 1 "A" Train Penetration Room Filtration System	7/30/82	98.24%	99.99%	Charcoal replaced on 2/5/83 as a precautionary measure.
"A" Train Control Room Filtration Unit	10/19/79 1/28/81 7/30/82	98.42% 98.63% 95.19%	99.99% 99.99% 99.99%	Charcoal replaced on 2/5/83 as a precautionary measure.
"B" Train Control Room Filtration Unit	1/28/81 8/19/82 8/31/82	95.39% 92.55%*	99.99% 99.99%	Charcoal replaced on 8/31/82 based on test results.

* LER 82-052/03L-0 (Unit 1) submitted on this test.

References:

- 1) Regulatory Guide 1.52, Revision 2, March 1978
- 2) ANSI N509-1976