

Alabama Power
Company
Exhibit 13



International Brotherhood of Electrical Workers

Local Union No. 796 — Dothan, Alabama

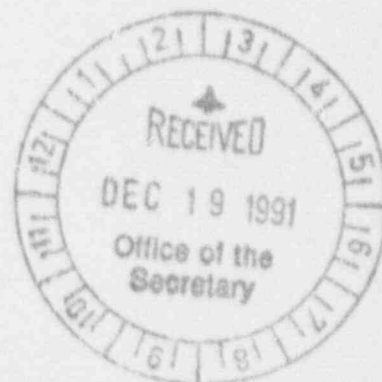


December 9, 1991

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Docketing and Service Branch

Gentlemen:



We have recently been made aware of proposed changes in the overtime policy at Farley Nuclear Plant. These changes are in direct conflict with our present contract entered into between Alabama Power Company and International Brotherhood of Electrical Workers. Per Article VIII, paragraph (s) of the Operating Agreement, it clearly defines the distribution and scope of overtime work.

"So far as may be practicable and consistent with the efficient performance of work to be done, the Company will distribute overtime work equitably among the employees covered by this agreement over reasonable periods of time with various units, locations and lines of work therein;"

As per the contract, we in the Brotherhood are the exclusive representatives of the employees by this agreement as outlined in Article I.

"This agreement covers the production, transmission, distribution, steam heat, meter test, garage, General Shops, stores, and appliance repair employees and the meter readers of the Company except supervisors, clerks, and professional employees; that is, those employees who are engaged in the operation and maintenance of the generating, steam heat, transmission and distribution properties of the Company, including any new plant, extensions or additions which may be put into operation during the term of this agreement."

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PDR ADOCK 05000348
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As further stated in Article III, paragraph (a):

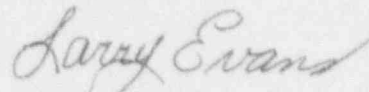
"The Company recognizes the right of its employees to bargain collectively through representatives of their own choosing; and recognizes the Brotherhood as the exclusive representative of the employees covered by this agreement for the purposes of collective bargaining in respect to rates of pay, wages, hours of employment, working conditions, and other conditions of employment herein provided for."

We have assumed further contract obligations as stated above. In our position as bargaining agent, we have entered into numerous agreements pertaining to scheduling overtime and general working conditions. As stated in your letter dated May 24, 1991 from Mr. Steven A. Varga (Director, Division of Reactor Projects - I/II), entitled "Operator Work Schedules at the Joseph M. Farley Nuclear Plant, Units 1 and 2," we feel that you have entered as a participant into our contract. If your intended position is to enter into our contract as a bargaining participant, we obviously have many concerns which need to be addressed by the Nuclear Regulatory Commission staff as soon as possible.

We have represented employees covered by the Collective Bargaining Agreement at Farley Nuclear Plant as it related to safe working conditions. Our decisions and agreements made with Alabama Power Company were always with safe operation of the plant our highest concern. Furthermore, the training our members receive ensures that the work is accomplished in a most professional manner. We believe that the current approach to scheduling overtime on a plant-wide integrated basis, promotes safe working conditions. As the attached petition shows, we believe that the plant's current approach to overtime staffing should be maintained.

In closing, a review of the operating history of Farley Nuclear Plant upholds our position that our decisions have reflected our concern for the safe operation of the plant.

Sincerely yours,



Larry Evans
President
IBEW Local 796
Rt. 1, Box 74-G
Headland, Alabama 35345

Attachments



International Brotherhood of Electrical Workers

Local Union No. 796 — Dothan, Alabama



December 09, 1991

We the undersigned do hereby petition the NRC in that we feel the current operations outage overtime policies be maintained in their present form.

NAME

ADDRESS

| | |
|-------------------|---|
| Barclay L. Kaelin | R 8 Box 183 Dothan AL 36301 |
| Grant K. M. Hill | 1001 CLEARMONT DRIVE DOTHAN AL 36301 |
| Mike Whitcraft | 1217 SOUTHLAND DRIVE, DOTHAN AL 36301 |
| A. D. Denny | 500 CHAPPELWOOD DR DOTHAN AL 36301 |
| Gregg W. W. W. W. | 1002 N. Panting Ave. Dothan, AL 36303 |
| Arthur R. R. | 228 FORREST ST. HEADLAND, AL 36345 |
| Ed Crawford | 1009 Northfield Circle, Dothan AL 36303 |
| Richard R. R. | Rt 1 Box 548 Webb AL 36376 |
| Mr. R. R. | 3109 Hickory Hill Dothan AL 36307 |
| Gregg Anthony | Rt 3 Headland AL 36345 |
| James A. Lambert | Rt 3 Box 794-B ASHFORD, AL 36312 |
| Denny Williams | Rt. 1 Box 43 Webb AL 36376 |
| Wyatt A. A. | Rt. 1 Box 186A Columbus, AL 36319 |
| Ed R. R. | Rt. 1 Box 937-A Webb, AL 36376 |
| Robert W. W. | Rt 5 Box 705 Blakely GA 31723 |
| W. K. K. | 311 Fox Run Tr. Dothan, AL 36303 |
| Michael S. S. | Rt 3 Box 745 Slacomb, AL 36375 |



International Brotherhood of Electrical Workers

Local Union No. 796 — Dothan, Alabama



December 09, 1991

We the undersigned do hereby petition the NRC in that we feel the current operations outage overtime policies be maintained in their present form.

NAME

ADDRESS

Ker B. Hitt Rt 1 Box 187 Pensacola 36376

James L. Schuler 1006 Green Rd, Dothan, AL 36301

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~~John A. Thompson 500 Chapelwood Dothan AL 36301~~

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Paul Lundberg R2 B3E Columbia, AL 36319

Donald T. Newell Rt. 11, Box 227-A, Dothan, AL 36301

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Paul H. 3025 GREEN RD DOOTHAN ALA 36303

James L. Rye Rt 3, Box 537 ABBEVILLE, ALA 36310



International Brotherhood of Electrical Workers

Local Union No. 796 — Dothan, Alabama

Form 10

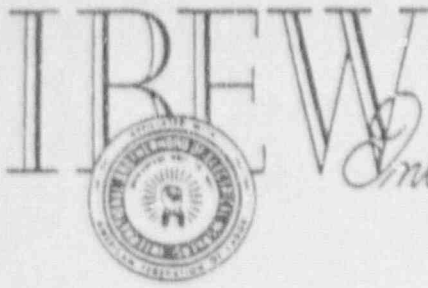
December 29, 1991

We the undersigned do hereby petition the NRC in that we feel the current operations outage overtime policies be maintained in their present form.

NAME

ADDRESS

| | |
|-----------------------|--|
| Joseph Alar Wall | 103 Traxet CT Dothan, AL 36301 |
| Darlene E. Wall | 141 WOODBURN DR APT. 21 DOTHAN, AL 36301 |
| Lydia L. Wall | 1208 Jefferson St Dothan AL 36303 |
| Donna | 306 E WOODLAND DR DOTHAN AL 36301 |
| Mark | Ten + County Midland City AL 36350 |
| W. C. Wall | 612 East Collins Dothan AL 36301 |
| W. C. Wall | RT 1 Box 948 PANSEY, AL 36370 |
| (Mike Bealby) | 1996 CHARLTON DR DOTHAN AL 36303 |
| Erud R. Ray | 209 Dexter St. - Dothan, AL 36301 |
| Mike Jackson | RT 1 Box 40 Newville AL 36353 |
| Bohlyf J. Hunter | RT. 1, Box 225, Abbeville, AL 36310 |
| Calvin M. Barber | 223 Alpha St. Midland City, AL 36350 |
| Pat Schaefer | Rt 18, Box 143-B Dothan AL 36301 |



International Brotherhood of Electrical Workers

Local Union No. 796 — Dothan, Alabama



December 09, 1991

We the undersigned do hereby petition the NRC in that we feel the current operations outage overtime policies be maintained in their present form.

NAME

ADDRESS

James E. Blair

AT 3 Box 273 Walland AL 36395

Man

1019 Honeysuckle Rd Dothan AL 36301