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**F. L. Clayton, Jr.**  
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March 26, 1984

Docket Nos. 50-348  
50-364

Director, 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  
Hydrostatic Testing Relief Request

Gentlemen:

This letter supplements Alabama Power Company's Hydrostatic Testing Relief Request dated March 19, 1984 related to the replacement of the Unit 1 feedwater to steam generator nozzle reducers. After cutting the reducers from the "C" feedwater line, slight misalignment was experienced due to a believed "cold spring" affect. The correction of the misalignment will require that at least 1 cut be made in the horizontal section of the "C" feedwater line which begins approximately 35 linear feet from the steam generator nozzle. The cutting and resultant rewelding is for the sole purpose of realignment and is not related to the feedwater nozzle cracking issue. It is noted that there was no evidence of misalignment on the A or B feedwater piping lines.

Alabama Power Company will realign the feedwater pipe to the "C" steam generator utilizing materials which meet the requirements of the ASME Section XI Code. These materials will be welded utilizing procedures qualified to the Code, heat treated and nondestructively examined pursuant to the Code.

Alabama Power Company hereby amends the March 19, 1984 relief request to include the welding necessary to complete the aforementioned realignment of the "C" feedwater line. It is emphasized that the alternative examinations committed to for the nozzle areas of the feedwater lines in the March 19, 1984 relief request are unaffected by this supplement.

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Mr. S. A. Varga  
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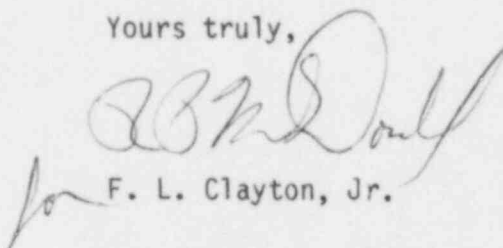
In accordance with 10CFR50.55a(g)(6)(i), Alabama Power Company hereby requests that relief be granted from certain requirements of the 1974 Edition through the Summer 1975 Addenda of the ASME Code, Section XI, Articles IWA-5000 and IWD-4210. A summary of the proposed relief request, existing examination requirements, bases for the relief request, and proposed alternative examinations is attached.

It is requested that this relief be granted by March 27, 1984 to preclude extension of the current refueling outage critical path.

This relief request supplements the March 19, 1984 request which was designated as a Class III "required approval" in accordance with 10CFR170.22 requirements. Since this supplement does not substantively change the original relief request and the NRC Staff has not completed their review, no additional fee remittance is required.

If you have any questions, please advise.

Yours truly,



F. L. Clayton, Jr.

FLCJr/QJS:grs-D32  
Attachment

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

Attachment

COMPONENT

CODE CLASS: 2

Steam Generator Feedwater Lines

EXAMINATION REQUIREMENT:

IWA-4210 requires that a pressure test be performed in accordance with IWA-5000 following repairs made by welding on the pressure retaining boundary components.

BASIS FOR RELIEF:

Repairs are in progress to three feedwater lines on Farley Unit 1 during the current refueling outage.

Hydrostatic pressure testing of the feedwater lines would include the steam generators since the new welds cannot be isolated from the generator secondary side. There are only five hydrostatic test cycles allowed by steam generator design. Two test cycles were conducted as part of initial plant startup leaving three remaining test cycles for the remaining life of the plant. Alabama Power Company does not believe a post repair hydrostatic pressure test is necessary to confirm the integrity of the new welds. Therefore, relief is requested from this requirement.

ALTERNATIVE EXAMINATION:

As an alternative, a visual examination will be performed at operating pressure for the new feedwater system welds.

In addition, for the welds in the feedwater nozzle to steam generator area, extensive non-destructive examinations will be conducted on each new weld including radiographic examinations on the root pass and intermediate welds and ASME Code radiographic examination and ultrasonic (new baseline) examination of each completed new weld. Additionally, these welds will be volumetrically examined at the next refueling outage.

For welds located in the feedwater piping substantially upstream of the nozzle area, an ASME Code radiographic examination and ultrasonic (new baseline) examination will be conducted on each completed new weld.

It is our position that the above examinations are sufficient to demonstrate the integrity of the new feedwater system welds.