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January 16, 1992

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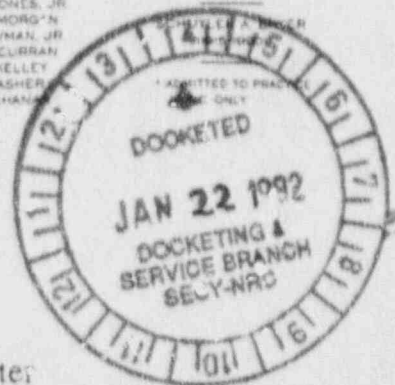
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VIA FEDERAL EXPRESS

John H. Frye, III  
Administrative Judge  
Atomic Safety and Licensing Board  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. James H. Carpenter  
Administrative Judge  
Atomic Safety and Licensing Board  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Peter A. Morris  
Administrative Judge  
10825 South Glen Road  
Potosi, Maryland 20854

IN THE MATTER OF  
Alabama Power Company  
(Joseph M. Farley Nuclear Plant, Units 1 and 2)  
Docket Nos. 50-388-CivF; 50-364-CivP  
ASLBP No. 91-626-02-CivP

Dear Administrative Judges:

Enclosed is the Direct Testimony of Alabama Power Company in this proceeding. Also enclosed are copies of Alabama Power Company's Exhibits to be introduced along with the testimony, and a copy of the testimony in ASCII form on 5.25 inch floppy disks.

Attached to this letter is a chart showing, in summary form, each major issue and the position of the parties. We plan to include this chart as part of our Opening Statement to be filed later this month. However, because it may be useful to you in reviewing the testimony and exhibits, we are providing a copy now.

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BALCH & BINGHAM

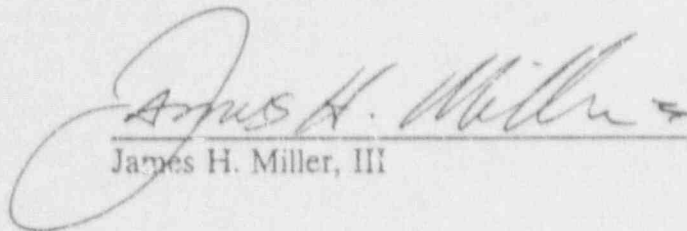
Messrs. Frye, Carpenter and Morris

January 16, 1992

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We note that in filing its direct testimony, the NRC Staff has also filed a "Notice of the NRC Staff's Intention Not to Pursue Certain Items from the Notice of Violation in the Above Captioned Proceeding." This Notice withdrew three discrete violations from those cited in the Notice of Violation dated August 15, 1988. In view of the NRC Staff's burden of proof in this proceeding (see generally, 10 CFR § 2.732; Radiation Technology, Inc., ALAB-567, 10 NRC 533, 536-37 (1979)), we respectfully request that at the appropriate time this Board make a finding in favor of Alabama Power Company on these issues.

Respectfully yours,



James H. Miller, III



David A. Repka

COUNSEL FOR ALABAMA POWER COMPANY

Enclosures

cc: Certificate of Service

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

ALABAMA POWER COMPANY

(Joseph M. Farley Nuclear  
Plant, Units 1 and 2)

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Docket Nos. 50-348-CivP  
50-364-CivP

ASLBP No. 91-626-02-CivP

CERTIFICATE OF SERVICE

I hereby certify that copies of the "DIRECT TESTIMONY OF ALABAMA POWER COMPANY" and Alabama Power Company's Exhibits (unless noted) in the above-captioned proceeding have been served on the following by Federal Express as indicated by an asterisk, or otherwise through deposit in First Class United States Mail, this 16th day of January, 1992:

John H. Frye, III\*  
Administrative Judge  
Atomic Safety and Licensing Board  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Peter A. Morris\*  
Administrative Judge  
10825 South Glen Road  
Potomac, Maryland 20854

Office of the Secretary  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
Attn: Docketing and Service Section

Adjudicatory File (2)  
Atomic Safety and Licensing Board Panel  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
(Without Exhibits)

Dr. James H. Carpenter\*  
Administrative Judge  
Atomic Safety and Licensing Board  
U. S. Nuclear Regulatory Commission  
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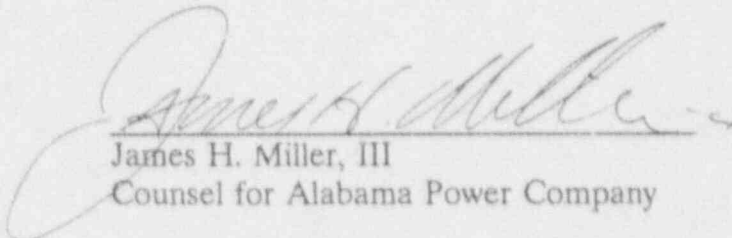
Atomic Safety and Licensing Board  
Panel  
U. S. Nuclear Regulatory Commission  
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James H. Miller, III  
Counsel for Alabama Power Company

## EQ NOV MATRIX

ISSUE	NRC POSITION	APCO POSITION ON QUALIFICATION	SAFETY SIGNIFICANT	EVOLVING ISSUE
1. V-Splices	Not on Master List, not qualified.	Such splices are not required to be on the Master List. NRC SER in 1981 approved the Master List without splices being listed. NRC inspected interface integrity in 1980 without identifying violations or deviations. Okonite testing proved splice materials qualified. "V" configured splices qualifiable based on engineering judgment. This engineering judgment was confirmed by test of such splices by Wyle test.	No.  Since qualification provided by Wyle testing.	Yes.  No basis to question terminations in 1985.
2. 5-to-1 Tape Splices	Not on Master List, not qualified.	Such splices are not required to be on the Master List. NRC SERs in 1981 approved the Master List without splices being listed. NRC inspected interface integrity in 1980 without identifying violations or deviations. NRC SERs in 1983 stated Hydrogen Recombiners were qualified. Westinghouse testing which proved Hydrogen Recombiners were qualified was conducted using identically configured splices. Okonite testing proved splice materials used at FNP were qualified. Therefore splices used at FNP were qualified by similarity.	No.  Since qualified by similarity to tested splice.	Yes.  Previously approved; not an issue in 1985.
3. Terminal Blocks in Instrumentation Circuit	Documentation does not demonstrate terminal blocks would maintain acceptable instrument accuracy.	NRC knew as early as 1978 that FNP used terminal blocks in instrumentation circuits. Franklin and NRC was again informed of this use in 1983 and found terminal blocks in instrument circuits to be qualified. The concerns documented in IN 84-47 were addressed during the 1/11/84 meeting with the NRC Staff and documented in the 2/29/84 letter from APCo to NRC. The NRC 12/13/84 SER provided assurance that the resolution to this issue was acceptable to NRC.  Terminal blocks used in instrumentation circuits are qualified at FNP since the terminal blocks would maintain acceptable instrument accuracy during the portions of the design basis events where operator actions were necessary. Said another way, the instruments associated with the terminal blocks in question are not required during the portion of the design basis events when unacceptable instrument accuracy could be expected. Operator actions, based on these instruments, are not required during peak adverse containment conditions.	No.  Analysis has shown that terminal blocks would not degrade to the point where plant operators would be misled.	Yes  Instrument accuracy issues evolved considerably post-deadline.



ISSUE	NRC POSITION	APCO POSITION ON QUALIFICATION	SAFETY SIGNIFICANT	EVOLVING ISSUE
4. Raychem/Chico Seals	File did not demonstrate qualification. File did consider possible chemical interaction.	The file adequately documented the qualification of the Raychem/Chico seals used in Namco limit switches. 10 CFR 50.49, DOR Guidelines, and NUREG-0588 allows qualification using partial testing and analysis. As such, APCo had Raychem testing which qualified the heat shrink breakout boot to FNP parameters (radiation, temperature, humidity, chemical spray), testing of Chico A cement, which qualified this material to FNP parameters (radiation only, since protected by Raychem boot and pipe nipple); and APCo/Bechtel testing of Raychem boot and Chico A cement when used in combination which proved that the combination would not fail when subjected to pressure (a problem identified by Raychem and duplicated at FNP without the Chico backing).	No. Raychem/Chico seals are qualified.	Yes. Seals were qualified. Documentation sufficient under 1985 or 1987 standards.
5. Limitorque T-Drains	Limitorque MOVs are not qualified without T-drains.	Limitorque tested MOVs both with an without motor T-drains. These tests, when taken together as allowed by 10 CFR 50.49, envelope FNP post-accident conditions and adequately demonstrate that T-drains are not required to ensure that Limitorque MOVs will perform their intended safety-related functions.	No. MOVs are qualified without such drains at Farley Nuclear Plant.	Yes. Issue evolved after deadline.
6. Limitorque Terminal Blocks	Installed components not identical to that tested. IN 83-72 should have prompted walkdown.	APCo had reasonable assurance that the MOVs in question were qualified. NRC indicated that IN 83-72 applied to MOVs modified by third-party vendors. APCo had certificates of conformance to appropriate test reports from Limitorque, appropriate receipt inspection, as well as NRC-accepted QC and QA programs. APCo therefore had every reason to believe that: (1) Limitorque MOVs supplied to FNP were the MOVs that were specified; (2) the MOVs specified, received, and installed were the same as the MOVs tested; and (3) the MOVs were appropriately installed. Based on this alone, at the time that IN 83-72 was issued, APCo had sufficient assurance that IN 83-72 did not apply to FNP. Moreover, it must be noted that in 1986 (after the deadline), NRC issued IN 86-03 concerning unqualified Limitorque internal wiring. This did prompt disassembly type walkdowns at FNP. Additionally, since the NRC Staff refrained from escalated enforcement on the subject because it was not clear that licensees should have known of the concern and since the internal wiring of concern to IN 86-03 terminates on the blocks of concern here, we believe this to be	No. There is reasonable assurance that MOVs would have performed intended function.	Yes. No basis to identify/address MOV internals prior to deadline.

ISSUE	NRC POSITION	APCO POSITION ON QUALIFICATION	SAFETY SIGNIFICANT	EVOLVING ISSUE
6. (Continued)		clear evidence that licensees (including APCo) cannot meet the "clearly should have known" standard established by the NRC in the Modified Policy which must be satisfied before a civil penalty can be imposed.		
7. Gems Level Transmitter	Not qualified without silicone oil or with V-splice.	See No. 1 for V-splice discussions. Low or missing silicone oil is not an EQ program deficiency. The EQ program established that the maintenance program would address EQ matters (e.g., periodic replacement, necessary gasket replacements, installation, in accordance with vendor instruction manuals, etc.). Furthermore, maintenance related to EQ components assumes that non-EQ maintenance activities (e.g., calibrations) are performed. As such, if maintenance activities are not performed, it in no way implicates the EQ program. Moreover, these transmitters are qualified to perform their safety-related function without silicon oil. This is based on the absence of safety-related function of these transmitters.	No.  Not primary means of switching from RWST to containment sump.	Yes.  Maintenance was not an EQ issue prior to EQ deadline.
8. Premium RB Grease	Unqualified or mixed grease (not identical to tested).	Grease serves only a mechanical component lubrication function. As such, it cannot perform any electrical function. Since 10 CFR 50.49 clearly only requires qualification of electrical components by test or similarity, the use of a different grease from that tested cannot be the subject of a fine under a policy applicable to this rule. The vendor specifically states that an equivalent grease is acceptable. Texaco Premium RB grease is equivalent to the vendor-recommended grease. Moreover, Premium RB grease was later shown to be fully qualified (even though such qualification is not required). Moreover, the mixing of grease, even though not an ideal practice, does not prevent the grease from performing its intended lubrication function.	No.  Grease used was equivalent to that tested and later shown to be fully qualified.	No.  Issue evolved after deadline.