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March 13, 1985

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  
10CFR50.48 and 10CFR50, Appendix R  
Fire Protection Exemption Requests

Gentlemen:

Alabama Power Company has conducted a second review of the Farley Nuclear Plant fire areas in Unit 2 and fire areas shared by Units 1 and 2. This review was conducted to determine the level of compliance with the requirements of 10CFR50.48 and 10CFR50, Appendix R in light of the interpretations to Appendix R set forth in IE Notice 84-09 and Generic Letter 83-33. As a result of this review, the enclosed document J. M. Farley Nuclear Plant, 10CFR50 Appendix "R" Fire Hazards Analysis Reevaluation: February 1985 containing the technical exemption requests from the provisions of 10CFR50 Appendix R is submitted, pursuant to 10CFR50.12(a), for NRC approval. Similar exemption requests for the remaining Unit 1 fire areas will be submitted for approval in May 1985. Appendix R compliance reports for each unit, including the criteria used for the review, will be prepared after the completion of the Unit 1 submittal and are scheduled to be available at the plant site by the end of 1985.

The necessary plant modifications identified in the enclosed technical and scheduler exemption request 2-037 have been implemented with the exception of the kaowool wrap of the Train-A charging pump power cables. It is estimated that this modification will be completed by March 15, 1985.

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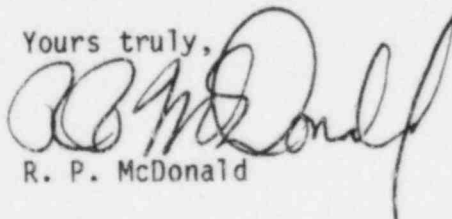
As described in the enclosed technical exemption requests 2-009 and 2-018, Alabama Power Company proposes to install disconnect switches outside the electrical penetration room for the charging pump suction and discharge valves. Consequently, a scheduler exemption is also requested, pursuant to 10CFR50.12, from the requirements of 10CFR50.48(c)(3). The requested scheduler exemption is to allow installation of the modifications described in exemption requests 2-009 and 2-018 to be deferred until the first outage of sufficient duration subsequent to design and procurement completion, but no later than the Unit 2 fourth refueling outage which is currently scheduled for the second quarter of 1986. The need for this modification was not identified until February 26, 1985. Design and material procurement could not be obtained in time to allow installation of these modifications during the Unit 2 third refueling outage (the estimated lead time on the Class I-E disconnects is 12-16 weeks). Compensatory actions which will be taken until the modifications are completed are described in the exemption requests.

It should be noted that Alabama Power Company has developed a detailed shutdown/repair procedure for a cable spreading room fire in Unit 2 which is considered to have the most severe impact on plant safe shutdown and recovery. This procedure conforms to the guidance issued in Generic Letter 83-33. Similarly, detailed procedures for all other fire areas of the plant will be developed based upon the detailed unit compliance report and implemented prior to the end of the Unit 2 fourth refueling outage currently scheduled to commence during the second quarter of 1986. These procedures will include any operator action identified in the attached exemption requests. Consequently, a scheduler exemption is also requested, pursuant to 10CFR50.12, from the requirements of 10CFR50.48(c)(1) for this procedure development based upon the schedule described above. Justification for continued operation until these procedures are developed and approved is provided in Attachment 1.

In accordance with 10CFR170.21, enclosed is the application fee of \$150.00.

If you have any questions, please advise.

Yours truly,



R. P. McDonald

RPM/DHJ:bdv-D37

cc: Mr. L. B. Long  
Regional Administrator  
Mr. E. A. Reeves  
Mr. W. H. Bradford  
Mr. G. F. Trowbridge

## Attachment 1

### Justification for Continued Operation

The following justification for continued operation is provided until detailed procedures for fire areas other than the cable spreading room fire are developed. (A procedure for the cable spreading room has been issued). These detailed procedures will be based upon the detailed unit compliance report and will be implemented prior to the end of the Unit 2 fourth refueling outage currently scheduled to commence during the second quarter of 1986.

1. Operators will be made aware that the enclosed document contains information that can assist them in responding to a fire in an area other than the cable spreading room.
2. Additional operator actions/repairs that are necessary to achieve cold shutdown are longer term items which would allow time for operator determination of the problem and the appropriate solution.

To assist in this determination of the problem, the operators have available:

- a) Existing Emergency Response Procedures, while not written to specifically address a fire in an area, could be used by the operator in the presence of potential fire damage to a single train,
- b) existing emergency assistance organizations comprised of scheduled on-call personnel with established contacts within the design organization,
- c) the design organization with responsibility for the Appendix R analysis has available information which can be used to determine the appropriate action.