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Alabama Power
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Docket No. 50-351

Director, Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. S. A. Varga

Joseph M. Farley Nuclear Plant - Unit 2
Closure of Completed License Conditions

Gentlemen:

The operating license for the Joseph M. Farley Nuclear Plant - Unit 2 contains several license conditions that have been completed by Alabama Power Company but have not been previously identified to the NRC as being complete. Many of these license conditions have resulted in commitments for additional action beyond the requirements of the license. Attached is a description of nine license conditions that are complete and the subsequent commitments made to address any remaining outstanding issues such as NUREG-0737. Since the nine license conditions are complete, Alabama Power Company respectfully requests that they be formally closed by the NRC. This letter supercedes our letter of October 19, 1982 relating to these conditions.

Yours very truly,

F. L. Clayton, Jr.
F. L. Clayton, Jr.

FLCJr/GGY:1sh-D34

Attachment

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

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(1) License Condition 2.C.(18)(a), (b) and (c)

Requirement: The licensee shall take the following remedial actions, or alternative actions, acceptable to the NRC, with regard to the environmental qualification requirements for Class 1E equipment:

- (a) Complete and auditable records shall be available and maintained at a central location which describes the environmental qualification method used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with NUREG-0588, "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," dated December 1979. Such records shall be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified to document complete compliance no later than June 30, 1982.
- (b) Within 90 days of receipt of the equipment qualification safety evaluation (Appendix B to SER Supplement 6, NUREG-0117), the licensee shall either (i) provide missing documentation identified in Sections 3.0, 4.2 and 4.3 of the equipment qualification safety evaluation which will demonstrate compliance of the applicable equipment with NUREG-0588, or (ii) commit to corrective actions which will result in documentation of compliance of applicable equipment with NUREG-0588 no later than June 30, 1982.
- (c) No later than June 30, 1982, all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of NUREG-0588.

Response:

Alabama Power Company has made several submittals documenting the environmental qualification of applicable equipment in accordance with NUREG-0588. The completion date of June 30, 1982 for having all applicable equipment qualified has been superseded by 10 CFR 50.49 which suspends the completion date requirement. All current action on this issue is being taken in accordance with 10 CFR 50.49 and NUREG-0588. Alabama Power Company has completed all applicable requirements of this license condition and requests that it be formally closed by the NRC.

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(2) License Condition 2.C.(20)

Requirement: Prior to April 30, 1981, the licensee shall provide a schedule to the NRC for bringing the facility into compliance with Revision 2 of Regulatory Guide 1.97, "Instrumentation for Light Water Cooled Nuclear Power Plants to Assess Plant Conditions During and Following an Accident," dated December 1980.

Response: Alabama Power Company letter dated March 30, 1981 documented compliance with license condition 2.C.(20) by forwarding a schedule to meet the requirements of Revision 2 of Regulatory Guide 1.97. Subsequently, Alabama Power Company letter dated November 16, 1982 stated that the previously transmitted schedule was being withdrawn based on a mutual agreement between the NRC and Alabama Power Company. The recently issued NRC Generic Letter 82-33 establishes the latest guidance for demonstrating compliance with Regulatory Guide 1.97 such that all current action on this issue is being taken in accordance with the Generic Letter. Alabama Power Company has completed all applicable requirements of this license condition and requests that it be formally closed by the NRC.

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(3) License Condition 2.C.(21)(a)

Requirement: The licensee shall complete each of the following conditions to the satisfaction of the NRC by the times indicated. Each of the following conditions references the appropriate item in Section 22.5, "Dated Requirements" in SER Supplement 5, NUREG-0117:

(a) Guidance for the Evaluation and Development of Procedures for Transients and Accidents (1.C.1)

Prior to startup following the first refueling after January 1, 1982, complete the upgrading of emergency procedures and associated operator training.

Response: Alabama Power Company has made several submittals relating to license condition 2.C.(21)(a) and has referenced the Westinghouse Owners Group transmittal of November 30, 1981 which contains the latest available guidelines for emergency operating procedures. The actions taken by Alabama Power Company in association with the Westinghouse Owners Group satisfy the applicable requirements of license condition 2.C.(21)(a). Subsequent action by the NRC (i.e., issuance of Generic Letter 82-33) establishes revised guidance on upgrading emergency operating procedures such that all current action on this issue is being taken in accordance with the Generic Letter. Alabama Power Company has completed all applicable requirements of license condition 2.C.(21)(a) and requests that it be formally closed by the NRC.

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(4) License Condition 2.C.(21)(b)Requirement: (b) Reactor Coolant System Vents (II.B.1)

Submit a design description and operating procedures for reactor coolant system vents prior to July 1, 1981 and complete installation prior to July 1, 1982.

Response:

Alabama Power Company letters dated June 25, 1981 and December 21, 1981 document completion of all installation work associated with the reactor system vents. Operating procedures were submitted as part of the Westinghouse Owners Group letter dated November 30, 1981. Final implementation of the reactor coolant system vent operating procedures will not be accomplished until NRC approval is given for the design of the installed system. Alabama Power Company has completed all requirements of license condition 2.C.(21)(b) and requests that it be formally closed by the NRC.

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(5) License Condition 2.C.(21)(g)(1), (2) and (3)Requirement: (g) Inadequate Core Cooling Instruments (II.F.2)

For the proposed reactor vessel water level instrument,

- (1) Provide detailed design information identified in Section 22.5 of SER Supplement 5, Requirement A, Parts (1)(a), (3), (4), (7), (8) and (9) prior to July 1, 1981.
- (2) Provide results of tests on Fairley Unit 1 for consideration in this facility prior to July 1, 1981.
- (3) Provide planned program to complete development, including any additional test data needed to determine feasibility, prior to January 1, 1982.

Response:

Alabama Power Company letter dated June 29, 1981 documented compliance with license conditions 2.C.(21)(g)(1), (2), and (3). Subsequently, Alabama Power Company letter dated August 3, 1982 stated that the previously transmitted program plan was being terminated based on a mutual agreement between the NRC and Alabama Power Company. The recently issued NRC Generic Letter 82-28 establishes the latest guidance on this subject such that all current action is being taken in accordance with the Generic Letter. Alabama Power Company has completed all requirements of these license conditions and requests that they be formally closed by the NRC.

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(6) License Condition 2.C.(21)(h)(1)

Requirement: (h) Commission Orders on Babcock & Wilcox Plants,
Subsequently Applied to all PWR Plants (II.K.2.)

Prior to January 1, 1982,

- (1) Submit a detailed analysis of the thermal mechanical conditions in the reactor vessel during recovery from small break LOCAs with an extended loss of all feedwater (II.K.2.13).

Request:

Alabama Power Company letters of January 14, 1981 and December 22, 1981 documented the fact that license condition 2.C.(21)(h)(1) would be addressed as part of a Westinghouse Owners Group generic effort. The required analysis was submitted to the NRC by the Westinghouse Owners Group in a letter dated December 30, 1981. All subsequent action on this issue was agreed to by Alabama Power Company and the Westinghouse Owners Group in response to NUREG-0737, Item II.K.2.13. Alabama Power Company has completed all requirements of this license condition and requests that it be formally closed by the NRC.

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(7) License Condition 2.C.(21)(h)(2)

Requirement: (h) Commission Orders on Babcock & Wilcox Plants,
Subsequently Applied to all PWR Plants (11.K.2)

Prior to January 1, 1982,

- (2) Provide an analysis of the potential for voiding in the reactor coolant system during anticipated transients (11.K.2.17).

Response:

Alabama Power Company letter dated December 22, 1981 documented compliance with license condition 2.C.(21)(h)(2) by referencing submittal of the required analysis attached to an April 20, 1981 letter from the Westinghouse Owners Group. Alabama Power Company has completed all requirements of this license condition and requests that it be formally closed by the NRC.

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(B) License Condition 2.C.(21)(1)(2)(i) and (ii)

Requirement: (1) Final Recommendations of B&O Task Force (II.K.3)

(2) With respect to tripping of reactor coolant pumps (RCPs) (II.K.3.5):

(i) Submit to the NRC for approval either (1) an evaluation which shows that sufficient time is available to the operator to manually trip the RCPs in the event of a small break LOCA, or (2) a description of design modifications required to provide for an automatic pump trip. This submittal is required within three months after NRC determination of acceptability of the small break LOCA model based on comparisons with LOFT test L3-6.

(ii) If required based on (i) above, complete plant modifications to provide for automatic tripping of reactor coolant pumps within 11 months after NRC determination of model acceptability, provided there is an appropriate outage during that time interval to complete installation or during the first such scheduled outage occurring thereafter.

Request: Alabama Power Company letter dated December 22, 1981 documented compliance with license conditions 2.C.(21)(1)(2)(i) and (ii) by referencing submittal of the Westinghouse Owners Group evaluation in letters dated March 3, March 23, and June 15, 1981. The conclusion was that automatic tripping of the RCPs is not required. Alabama Power Company has completed all applicable requirements of these license conditions and requests that they be formally closed by the NRC.

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(9) License Condition 2.C(21)(1)(4)(i) and (ii)Requirement: (1) Final Recommendations of B&O Task Force (11.K.3)

(4) With respect to a revised small break LOCA model,

(i) Prior to January 1, 1982, submit to the NRC a revised model to account for recent experimental data (11.K.3.30).

(ii) Submit to the NRC the results of plant-specific calculations using the NRC-approved revised model prior to January 1, 1983.

Response:

Alabama Power Company letter of December 22, 1981 documented compliance with license conditions 2.C.(21)(1)(4)(i) and (ii) by referencing the NRC approved small break LOCA model used in the licensing process for the Farley Nuclear Plant. Subsequently, NRC letter dated March 2, 1982 requested confirmation of a commitment by Alabama Power Company to participate in the Westinghouse Owners Group effort to address NUREG-0737, Item 11.K.3.30 generically. This commitment was confirmed in Alabama Power Company letters of March 26, 1982, June 4, 1982 and January 7, 1983. All current action on this issue is being taken in accordance with the January 7, 1983 Alabama Power Company letter on NUREG-0737, Item 11.K.3.30. Alabama Power Company has completed all requirements of license conditions 2.C.(21)(1)(4)(i) and (ii) and requests that they be formally closed by the NRC.