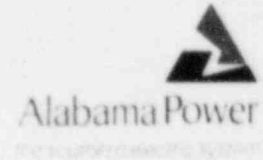


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R. P. McDonald
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January 17, 1986

Docket Nos. 50-348
50-364

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

Attention: Mr. L. S. Rubenstein

Joseph M. Farley Nuclear Plant - Units 1 and 2
Resolution of Containment Vent and
Purge Operation Issue

Gentlemen:

By letter of April 19, 1985, Alabama Power Company informed the NRC that it considered the NRC requests of January 31, 1985 as the initiation of the requirement for the backfitting of Units 1 and 2 of the Farley Nuclear Plant. After further review and discussions between Alabama Power Company and the NRC Staff, it is our understanding that resolution of the Containment Vent and Purge Operation issue can be achieved by amendment of the Technical Specifications as shown in the attachment to this letter. It is our understanding that such a Technical Specification change will result in closure of Multiplant Action B-24 and all other currently open issues on containment vent and purge at Farley Nuclear Plant. Upon written confirmation by the NRC that the attached Technical Specification changes would resolve these issues, Alabama Power Company will initiate a formal Technical Specification amendment request.

If you have any questions, please advise.

Yours very truly,

R. P. McDonald

RPM/JAR:dst-D29
Attachment

cc: Mr. L. B. Long
Dr. J. N. Grace
Mr. E. A. Reeves
Mr. W. H. Bradford
Mr. Dan Turner

App
1/1

PROPOSED TECHNICAL SPECIFICATION CHANGES
FOR CONTAINMENT PURGE

- I. 3.6.1.1 No change; 3.6.1.7 is governing Technical Specification
- II. 3.6.1.2 No change; 3.6.1.7 is governing Technical Specification
- III. 4.6.3.4 Delete; replaced by 4.6.1.7.3
- IV. 3.6.1.7 Change per attached
- V. 3/4.9.14.2 Correct mini-purge valve numbers and valve size from 18" to 8"
(already in draft Administrative Change)
- VI. Add to the Specification Bases:

The purpose of the quarterly degradation tests (Specification 4.6.1.7.2) of the isolation valves in the containment purge supply and exhaust lines is to identify excessive degradation of the resilient seats for these valves. These degradation tests may be performed using pressure decay methods, are performed in addition to the Type C tests required by Appendix J, and are not subject to the requirements applicable to Appendix J testing. However, these degradation tests do not replace Appendix J testing. Type C testing that is conducted pursuant to 4.6.1.7.3 will conform to the requirements of Appendix J. Failure to satisfy containment purge supply and exhaust isolation valve leakage rates specifications while in MODES 1-4 will be governed exclusively by the ACTION requirements of Specification 3.6.1.7 and not by other leakage specifications. The 12-hour time limit in ACTION Statement b will allow confirmation that containment integrity exists. Isolation of a penetration with leakage in excess of 0.6 L_a with a valve that has a non-degraded seal will allow maintenance to be performed on the other valve.

CONTAINMENT SYSTEMS

CONTAINMENT VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.1.7 Containment purge supply and exhaust valves shall be OPERABLE* and:

- a. The 48-inch containment purge supply and exhaust isolation valves (CBV-HV-3198A, 3198D, 3196, 3197) shall be de-activated and secured in their closed position.
- b. The 8-inch containment mini-purge supply and exhaust isolation valves (CBV-HV-2866C, 2866D, 2867C, 2867D) may be open for safety-related reasons.
- c. The leakage rates for the containment purge supply and exhaust penetrations shall be within the limits of Specifications 4.6.1.7.2 and 4.6.1.7.3.

APPLICABILITY: MODES 1, 2, 3 and 4

ACTION:

- a. With one 48-inch containment purge supply and/or one exhaust isolation valve open or not de-activated, de-activate and secure in the closed position the open valves(s) or isolate the penetration within four hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With the leakage rate for containment purge supply and exhaust penetrations exceeding the limit of Specification 4.6.1.7.2 or 4.6.1.7.3.a within 12 hours either:
 1. Reduce the leakage to within the limit, or
 2. Isolate containment purge supply and/or exhaust penetrations, as required to reduce the leakage rate from the containment atmosphere to the outside atmosphere to within the limit of Specification 4.6.1.7.2 by the use of at least:
 - a) one operable de-activated 48-inch inside containment purge supply or exhaust isolation valve secured in the closed position or secured by use of a blind flange, and one operable de-activated 8-inch inside containment purge supply or exhaust isolation valve secured in the closed position or secured by use of a blind flange, or

* This specification is governing for the containment purge supply and exhaust isolation penetration leakage and 48-inch isolation valve position.

CONTAINMENT SYSTEMS

CONTAINMENT VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

- b) one operable de-activated 48-inch outside containment purge supply or exhaust isolation valve secured in the closed position or secured by use of a blind flange, and one operable de-activated 8-inch outside containment purge supply or exhaust isolation valve secured in the closed position or secured by use of a blind flange, or
- 3. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- c. With the leakage rate for containment purge supply and exhaust penetrations exceeding the limit of Specification 4.6.1.7.3.b, reduce the leakage to within the limit:
 - 1. prior to entering MODE 4 following the next COLD SHUTDOWN if the existing leakage is determined during quarterly testing pursuant to Specification 4.6.1.7.2, or
 - 2. prior to entering MODE 4 if excess leakage is determined during COLD SHUTDOWN pursuant to Specification 4.6.1.7.3.

SURVEILLANCE REQUIREMENTS

4.6.1.7.1 The 48-inch containment purge supply and exhaust isolation valves shall be determined de-activated in the closed position at least once per 31 days.

4.6.1.7.2 At least once per 92 days on a STAGGERED TEST BASIS each penetration containing 8-inch and 48-inch containment purge supply and exhaust isolation valves with resilient material seals shall be demonstrated OPERABLE by verifying that when the leakage rates from degradation tests for both penetrations are added to the leakage rates determined pursuant to Specification 4.6.1.2.d for all other valves and penetrations subject to Type B and C tests, the combined leakage rate is less than or equal to $0.60 L_a$.

4.6.1.7.3 Each containment purge supply and exhaust isolation valve with resilient material seals shall be demonstrated OPERABLE prior to startup after each COLD SHUTDOWN, if not performed in the previous 92 days, by verifying that:

- a) when the measured leakage rate is added to the leakage rates determined pursuant to Specification 4.6.1.2.d for all other valves and penetrations subject to Type B and C tests, the combined leakage rate is less than or equal to $0.60 L_a$, and

CONTAINMENT SYSTEMS

CONTAINMENT VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

- b) the leakage rate for each containment purge supply and exhaust penetration is less than or equal to $0.05 L_d$.

In addition, the leakage rate for the containment purge isolation valves shall be compared to the previously measured leakage rate (for the containment purge isolation valves) to detect excess valve degradation.

An engineering evaluation shall be performed to determine what corrective action, if any, is necessary.

4.6.1.7.4 The resilient material valve seals of the 48-inch and the 8-inch containment purge supply and exhaust isolation valves shall be replaced at least once per 5 years.