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November 27, 1985

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
Proposed Generic Letter 85-19 and Dose Equivalent Iodine
Definition Technical Specification Change

Gentlemen:

NRC Generic Letter 85-19, "Reporting Requirements on Primary Coolant Iodine Spikes", indicated that reportable occurrences for iodine spiking and the requirement to shut down a plant if the coolant iodine activity is above 1.0 microCurie/gram for greater than 800 hours in a 12-month period can be eliminated. The reportability portion of Generic Letter 85-19 was incorporated into the Farley Nuclear Plant Technical Specification 6.9.1.13 by License Amendments 57 and 49 for Units 1 and 2, respectively. The elimination of the requirement to shut down the plant as described in Generic Letter 85-19 is hereby proposed by Alabama Power Company.

Additionally, the Farley Nuclear Plant FSAR environmental consequences analyses are based on the thyroid dose conversion factors (DCFs) listed in Table III of TID-14844, "Calculation of Distance Factors for Power and Test Reactor Sites" for calculating a thyroid inhalation dose. Consequently, the technical specification definition of Dose Equivalent I-131 is also based on the TID-14844 thyroid DCFs. Subsequent to the performance of the FSAR analyses, the NRC issued Regulatory Guide 1.109 to provide methods acceptable to the NRC for calculating doses for the purpose of evaluating compliance with 10CFR50, Appendix I. For routine releases, Alabama Power Company adopted a methodology for the Offsite Dose Calculation Manual (ODCM) which is consistent with the methodology of Regulatory Guide 1.109. As a result, both the Unit 1 and Unit 2 Technical Specification bases for the

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radiological effluent technical specifications were written to clearly identify the consistency between the ODCM and Regulatory Guide 1.109 methodologies for calculating doses due to actual releases. The definition of DEI-131, however, was not changed in either unit to make it consistent with the bases.

Alabama Power Company proposes changes to the Technical Specifications to make them consistent throughout and to reflect Generic Letter 85-19. The proposed changes are presented in Attachment 1.

These proposed changes are consistent with the NRC Generic Letter 85-19 and do not increase the DEI-131 numerical limit of 1.0 microCurie/gram in Specification 3.4.9 and 0.1 microCurie/gram in specification 3.7.1.4. Although the Regulatory Guide 1.109 DCFs are less limiting than those of TID-14844, the offsite releases from a steam generator tube rupture or steam line break accident, with the new technical specification DEI-131 definition, remain bounded by the existing FSAR analyses. There remains within the Limiting Condition for Operation of Specifications 3.4.9 and 3.7.1.4 adequate margin to the FSAR accident environmental consequences analyses. This change incorporates methodology which the NRC has found acceptable and is consistent with draft Revision 3 of NUREG-U472, the NRC Standard Radiological Effluent Technical Specifications for Pressurized Water Reactors (PWRs), and draft Revision 5 of NUREG-0452, the NRC Standard Technical Specifications for Westinghouse PWRs.

Since the proposed Technical Specification change includes no changes which would significantly increase the probability or consequences of an accident previously evaluated, no changes which create the possibility of a new or different kind of accident from any accidents previously evaluated and no changes which would involve a significant reduction in a margin of safety, it is considered by Alabama Power Company to not involve a significant hazards consideration as defined in 10CFR50.92. This conclusion is based upon the FSAR offsite doses for steam line break and steam generator tube rupture accidents remaining bounding and this change representing a comparatively minor change in an input parameter in the previously evaluated accidents. It should be noted that the margin to the 10CFR100 dose limits provided in the FSAR analyses remain unaffected by this proposed change. In addition, the elimination of the requirement to shut down the plant when the Dose Equivalent I-131 exceeds 1 microCurie/gram in the reactor coolant for over 800 hours in a 12-month period is consistent with NRC accepted practice as indicated by Generic Letter 85-19 and therefore does not constitute a significant hazards consideration.

Alabama Power Company's Plant Operations Review Committee has reviewed this proposed change and the Nuclear Operations Review Board will review this proposed change at a future meeting.

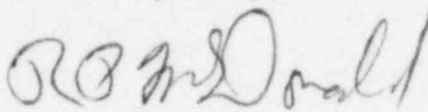
Mr. L. S. Rubenstein
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Pursuant to 10CFR170.21, the required License Amendment Application Fee of \$150.00 is enclosed. In accordance with 10CFR50.90, three signed originals and forty additional copies of this proposed change are enclosed. A copy of this proposed change has also been sent to Mr. Dan Turner, the Alabama State Designee, in accordance with 10CFR50.91(b)(1).

If you have any questions, please advise.

Yours very truly,



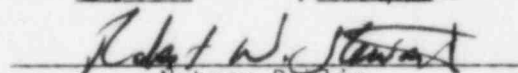
R. P. McDonald

RPM/CJS:ddb-D30
Attachments

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

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 27th DAY OF November 1985


Notary Public

My Commission Expires: 10/27/89