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Alabama Power
the southern electric system

December 9, 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 Administrative Technical Specification Change

Gentlemen:

Recent operating experience has identified several administrative corrections which are needed in each of the Joseph M. Farley Nuclear Plant Unit Technical Specifications.

Attachment 1 contains a discussion of the proposed administrative changes to both Units 1 and 2 Technical Specifications and provides supporting background information and justifications. Attachment 2 lists the changed Technical Specification pages and includes the proposed changed pages.

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 on the fact that each of the changes are either editorial or clerical revisions to the technical specifications as described in Attachment 1.

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Mr. L. S. Rubenstein
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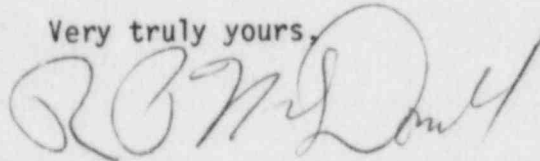
The Plant Operations Review Committee has reviewed this proposed change and the Nuclear Operations Review Board will review this proposed change at a future meeting. It is requested that this proposed change be approved by June 13, 1986. In order to facilitate the orderly implementation of these changes, it is requested that the License Amendments be made effective 60 days after issuance.

Pursuant to 10CFR170.21, the rule on license fees, the required License Amendment Application Fee of \$150.00 is enclosed.

In accordance with 10CFR50.90, three (3) signed originals and 40 copies of this request are enclosed. A copy of this change has been sent to Mr. Dan Turner, the Alabama State Designee in accordance with 10CFR50.91(b)(1).

If there are any questions, please advise.

Very truly yours,



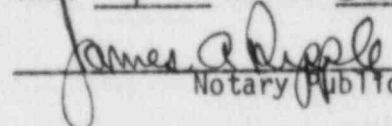
R. P. McDonald

RPM/CJS:ddb-D29
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 9th DAY OF December, 1985


Notary Public

My Commission Expires: 9-11-88

ATTACHMENT 1

Proposed Administrative Technical Specification Changes

1) Change to Technical Specification 4.3.3.9.1 (Both Units 1 and 2)

This specification currently requires that each fire detection instrument in Table 3.3-12 be functionally tested at least once per 6 months by subjecting the detector to test aerosol. This aerosol test is for smoke detectors. However, Table 3.3-12 contains both smoke detectors and heat detectors. The heat detectors can not use aerosol as a test means but must be functionally tested by a heat source according to design. Thus, an administrative change to this specification is needed to account for the different fire detection instruments. Therefore, the phrase "subjecting the detector to test aerosol" is proposed to be changed to "subjecting the detector to test aerosol or heat source, as appropriate." This is considered to be an editorial clarification.

2) Change to Technical Specification 3.3.3.9, Table 3.3-12 (Both Units 1 and 2)

- a) The Unit 1 Table 3.3-12 lists the total number of smoke detectors above the ceiling in Room 401 as 13 and the minimum number of operable smoke detectors as 7. The table is misleading because the 13 detectors listed are actually located in the space above the suspended ceiling of both Rooms 401 and 416, not just in Room 401. In addition, four smoke detectors have been relocated and an additional four detectors have been installed in the space above the suspended ceiling of rooms 401 and 416 to enhance the fire detection capability and clarify compliance with NFPA 72E regarding detector placement. Thus, the installation of these detectors was performed to enhance the fire detection capabilities of the plant and not to comply with technical specification requirements. In order to clarify the location of the detectors in the control room complex, Table 3.3-12 should be modified to show the number of detectors above and below the suspended ceiling for all rooms in the complex. Therefore, an administrative change is proposed to increase by four the total number of smoke detectors above the ceiling of the Unit 1 side of the control room and to provide an accurate breakdown of the detectors located above and below the suspended ceiling for all rooms in the control room complex.

Unit 1 Table 3.3-12 lists the total number of smoke detectors in Room 72A in the Strainer Bay as 12 and the minimum number of operable smoke detectors as 6. Each of the twelve installed smoke detectors are on the ceiling of the service water structure and would detect a fire anywhere in the area. However, six new detectors were installed under the service water pump deck strictly as an enhancement to the current fire detection capabilities. Therefore, an administrative change is proposed to increase the number of smoke detectors in Room 72A for the Strainer Bay from 12 to 18.

2) (Continued)

- b) Unit 2 Table 3.3-12 lists the total number of smoke detectors above the suspended ceiling in Room 2401 as 16 and the minimum number of operable smoke detectors as 8. The table is misleading because the 16 detectors listed are actually located in the space above the suspended ceiling of both Rooms 2401 and 2471, not just in Room 2401. In order to clarify the location of the detectors in the control room complex, Table 3.3-12 should be modified to show the number of detectors above and below the suspended ceiling for all rooms in the complex. Therefore, an administrative change is proposed to provide an accurate breakdown of the detectors located above and below the suspended ceiling for all rooms in the Unit 2 control room complex.

Unit 2 Table 3.3-12 lists the total number of smoke detectors in Room 72A in the Strainer Bay as 12 and the minimum number of operable smoke detectors as 6. Room 72A services both units and appears in both units' Technical Specifications. Thus, the same administrative change to Unit 1 Table 3.3-12 for increasing the total number of smoke detectors in Room 72A in the Strainer Bay from 12 to 18 also applies to this table.

Unit 1 Table 3.3-12 currently lists Room 212 as Battery Room 1A and Room 214 as Battery Room 1B. The correct descriptions should list Room 212 as Battery Room 1B and Room 214 as Battery Room 1A.

Unit 2 Table 3.3-12 currently lists Room 2212 as Battery Room 1A and Room 2214 as Battery Room 1B. The correct descriptions should list Room 2212 as Battery Room 2B and Room 2214 as Battery Room 2A. Thus, administrative changes are proposed to correct these errors. These changes involve the room descriptions only and have no impact on the total number of smoke detectors or the minimum number of operable smoke detectors.

These changes are considered to be editorial corrections and clarifications.

3) Change to Technical Specification 4.5.3.2 (Both Units 1 and 2)

The existing specification requires that the breaker for the valve operators for the charging pump discharge valves to the reactor coolant system (RCS) hot legs be verified locked open. In accordance with commitments made to comply with NUREG-0737, provisions have been made for these valves to have a separate disconnect device installed in order to obviate the need to operate the circuit breaker in an emergency.

3) (Continued)

It is therefore proposed to revise this technical specification to require the verification that the circuit breaker or the disconnect device is locked open. The disconnect device is a better suited device for energizing the valve operators in an emergency than are the circuit breakers. Reference to circuit breakers needs to be retained in this specification for the residual heat removal system valves which do not have a new disconnect device provided because they are not required to be operated in an emergency. This is considered to be an editorial clarification.

4) Change to Technical Specification 4.7.7.b and 4.7.7.e.4 (Both Units 1 and 2)

The current specification acknowledges that there are two types of systems, pressurization and recirculation, which serve the control room. The pressurization system is the only system which contains heaters. In order to clarify Technical Specifications 4.7.7.b and 4.7.7.e.4, reference to the pressurization system for heater verification is proposed by Alabama Power Company. This is considered to be an editorial correction.

5) Change to Technical Specification 4.7.11.1.3(c)(1) (Both Units 1 and 2)

This specification currently requires that the batteries, cell plates, and battery racks of the fire pump diesel starting 24-volt battery bank be verified once per 18 months to show no visual indication of physical damage or abnormal deterioration. However, the batteries are not designed for visual inspection of cell plates. Battery casings are opaque and it is not feasible to inspect the cell plates without destroying the integrity of the battery. Additionally, specification 4.7.11.1.3(a)(2) surveils the battery voltage once per 7 days, which would verify that no physical damage or abnormal deterioration is present. Therefore, an administrative change to this specification is proposed for deleting the words "cell plates" in order to clarify the scope of the visual inspection.

6) Change to Technical Specification 3.7.11.2, Table 3.7-5 (Both Units 1 and 2)

This specification lists spray and/or sprinkler systems required to be operable. Zone 72A, which is the service water pump area of the service water structure, currently lists sprinkler system 1SW-111 in Unit 1 technical specification Table 3.7-5. To enhance the coverage in this room, two new systems (111A and 111B) were added. As

6) (Continued)

described in the Joseph M. Farley Nuclear Plant Fire Protection Program Reevaluation (FPPR), each system has been designated to provide suppression coverage for certain areas within Zone 72A while all three systems are activated by fire detection system 1SW-111. Thus, in order to clarify the technical specification table to be consistent with the FPPR and the plant configuration, an administrative change is proposed to add sprinkler systems 1SW-111A and 1SW-111B to Table 3.7-5 of the Farley Technical Specifications. Zone 72A services both units even though the sprinkler system is designated as a Unit 1 system. Changes are therefore proposed to both the Unit 1 and 2 Technical Specifications for this room.

7) Change to Technical Specification 4.7.11.3.2(b)(2) (Both Units 1 and 2)

This specification currently requires that the low pressure CO₂ systems listed in Specification 3.7.11.3 verify, once per 18 months, flow from each nozzle during a "Puff Test." Verification of these tests is accomplished by visual inspection. The nozzles included in this specification, except for those in the diesel generator, day tank and cable spreading rooms, are located internal to switchgear panels and most of the panels are energized when the test is required. Verification of CO₂ flow through inaccessible nozzles located inside energized switchgear is performed by visually observing the CO₂ discharge from the exterior of the switchgear cabinets in the general location of the inaccessible nozzles. Any other effort to physically observe CO₂ discharge from the inaccessible nozzles would represent a significant potential personnel hazard. Additionally, any visual verification of flow at the inaccessible nozzle locations would represent a potential source of plant transients due to personnel contact. It should be noted that there are no isolation valves in the CO₂ system between the accessible and inaccessible nozzles and both accessible and inaccessible nozzles share common headers. Verification of flow during a "Puff Test" provides, therefore, reasonable confidence that CO₂ would fill the switchgear. Thus, an administrative change is proposed to clarify how the surveillance test is performed by deleting reference to nozzles in order to preclude any interpretation which could create a personnel hazard or increase the likelihood of unnecessary plant transients. It should be noted that the National Fire Protection Association Standard which governs CO₂ extinguishing systems (12.1-11) does not require visual verification of flow through each nozzle.

- 8) Change to Technical Specification 4.7.11.3.3(b)(2) (Both Units 1 and 2)

This specification currently requires, once per 18 months, the performance of a flow test through headers and nozzles to assure no blockage. The nozzles included in this specification are located internal to switchgear panels and most of the panels are energized when the test is required. Like the requirements of Specification 4.7.11.3.2(b)(2), verification of CO₂ flow through inaccessible nozzles located inside energized switchgear is performed by visually observing the CO₂ discharge from the exterior of the switchgear cabinets in the general location of the inaccessible nozzles. Any other effort to physically observe CO₂ discharge from the inaccessible nozzles would represent a significant potential personnel hazard. Additionally, any visual verification of flow at the inaccessible nozzle locations would represent a potential source of plant transients due to personnel contact. It should be noted that there are no isolation valves in the CO₂ system between the accessible and inaccessible nozzles and both accessible and inaccessible nozzles share common headers. Verification of flow during a "Puff Test" provides, therefore, reasonable confidence that CO₂ would fill the switchgear and extinguish the fire. Thus, an administrative change is proposed to clarify how the surveillance test is performed by deleting reference to headers and nozzles in order to preclude any interpretation which could create a personnel hazard or increase the likelihood of unnecessary plant transients. It should be noted that the National Fire Protection Association Standard which governs CO₂ extinguishing systems (12.1-11) does not require visual verification of flow through each nozzle.

- 9) Change to Technical Specification 3.7.11.4, Table 3.7-6 (Both Units 1 and 2)

This Specification lists the fire hose stations required to be operable. For the Unit 1 table, two fire hose cabinets are listed as being in Zone 72A of the service water intake structure. However, the hose cabinets are actually located just outside Zone 72A in Zones 72C and 72D. Thus, an administrative change is proposed to correct the room numbers and show the actual location of the hose cabinets. Additionally, this table lists Room 602 in the auxiliary building at elevation 139'-0", but the actual elevation of this room is 130'-0". Therefore, an administrative change to correct this error is also proposed.

For both units an administrative change to Table 3.7-6 is proposed to add the hose stations inside containment to the table. This change was proposed previously but was not incorporated into the Technical Specifications. The basis for proposing this change is as follows. Amendment 11 to Facility Operating License NPF-2 for the Joseph M. Farley Nuclear Plant, Unit 1 was issued by the NRC on

9) (Continued)

April 13, 1979. This amendment added a license condition relating to the completion of facility modifications and implementation of administrative controls for fire protection. Included in the amendment were three tables of proposed facility modifications to complete the fire protection program reevaluation against Appendix A of Branch Technical Position APCSB 9.5-1. One of the modifications to be completed was the installation of standpipe and hose stations inside containment. Amendment 11 to NPF-2 also required updated technical specifications for any completed modifications. By letter dated January 8, 1980 from F. L. Clayton, Jr. to A. Schwencer of the NRC, Alabama Power Company proposed changes to the Unit 1 Technical Specifications as a result of this license condition. In this letter, the hose cabinet at containment entrance for auxiliary building elevation 155'-0" was proposed for Table 3.7-5 (now Table 3.7-6). The NRC approved the proposed changes in Amendment 26 to Facility Operating License NPF-2, which was the general update of the Unit 1 Technical Specifications to make them consistent with the Unit 2 Technical Specifications which had been issued subsequently to these proposed fire protection changes. When the listing of fire hose stations was issued in Amendment 26, the hose cabinet at the containment entrance was not included.

The hoses associated with the eight hose station isolation valves inside containment are stored in a hose storage locker in the auxiliary building at the containment entrance, not in a hose cabinet. The hoses are not stored inside containment due to possible degradation from radiation exposure and protection of fire protection personnel from unwarranted exposures. The January 8, 1980 letter should have proposed adding a hose storage locker at containment entrance to Table 3.7-5 (now Table 3.7-6) rather than a hose cabinet. As stated in License Amendment 11 and in the FPPR, these hose stations are required to protect safe-shutdown equipment. Therefore, an administrative change to Technical Specification Table 3.7-6 is proposed to add the hose station isolation valves inside containment and the hose storage locker at containment entrance in the auxiliary building at elevation 155'-0". Alabama Power Company notes that the footnote associated with the fire hose storage locker is provided for clarification purposes to identify only the surveillances of specification 4.7.11.4 which are applicable to hoses. Likewise, the footnote associated with the isolation valves inside containment is provided for clarification purposes to identify the only surveillance of specification 4.7.11.4 which is applicable to valves. These changes are also considered to be editorial.

- 10) Change to Technical Specification 3.7.11.5, Table 3.7-7 (Both Units 1 and 2)

This specification currently lists valve N1Y43V121 as west of the service water intake structure and valve N1Y43V122 as east of the service water intake structure. The Unit 1 valves are listed in both Units 1 and 2 Technical Specifications because the service water intake structure is common to both units. The valve numbers listed are actually reversed. Therefore, an editorial correction is proposed to list valve N1Y43V121 as east of the service water intake structure and valve N1Y43V122 as west of the service water intake structure in order to correct the existing error.

- 11) Change to Technical Specification 4.8.3.1 and Bases (Unit 2 only)

Recent licensing actions by the NRC Staff have indicated that the protective capability of current limiting fuses do not decrease with service life, that surveillance testing of fuses are not meaningful, and that the additional handling of fuses during surveillance testing may compromise fuse integrity. Alabama Power Company, therefore, proposes to eliminate periodic fuse testing as a technical specification requirement. It is proposed, however, that a technical specification requirement be maintained for periodically verifying correct fuse sizes. The Bases have been modified to be consistent with this proposed change.

In addition, Surveillance Requirements 4.8.3.1 and 4.8.3.2 necessarily should be renumbered as 4.8.3.1.1 and 4.8.3.1.2 to avoid confusion with Surveillance Requirement 4.8.3.2 found on page 3/4 8-29 of the Unit 2 Technical Specifications.

Finally, consistent with the philosophy of NRC Generic Letter 84-13, "Technical Specification for Snubbers", Alabama Power Company proposes that the contents of Technical Specification Table 3.8-1 be controlled in accordance with 10CFR50.59. This would eliminate the need for a formal License Amendment whenever minor changes are proposed to the tabular listing of overcurrent protection devices. License Amendment 34 for Unit 2 will serve as the baseline list for the Farley Unit 2 procedures.

- 12) Change to Technical Specification 3.9.14 (Both Units 1 and 2) and Technical Specification Bases 3/4.6.1.7 (Unit 1 only)

The Farley Nuclear Plant, Units 1 and 2 no longer have 18-inch mini-purge isolation valves. The 18-inch valves were replaced with 8-inch valves in accordance with commitments made to the NRC Staff. Alabama Power Company, therefore, proposes to correct these Specifications to reflect the installed 8-inch mini-purge valves. This is considered to be an editorial correction.

- 13) Change to Technical Specifications 4.11.1.1.2, Table 4.11-1 and 4.11.2.1.2, Table 4.11-2 (Both Units 1 and 2)

Table Notation "v" of Technical Specification Table 4.11-1 and Table Notation "i" of Technical Specification Table 4.11-2 describe the appropriate methods of performing composite sampling for liquid and gaseous effluents, respectively. It is proposed that these table notations be clarified to include a requirement to report any discrepancies in the development of composite samples in the Semi-annual Radioactive Effluent Release Report. This is consistent with what is required for deviations from Minimum Detectable Concentrations (MDC) as described in Table Notations "g" and "h" for Technical Specification Tables 4.11-1 and 4.11-2, respectively. This change simply provides guidance for what action is to be taken should a discrepancy in composite sampling occur.

In addition, Table Notation "g" of Technical Specification Table 4.11-2 excludes I-131 and other gamma emitters from the application of the MDC specification. Alabama Power Company therefore proposes to delete reference to I-131 and other gamma emitters from the particulate sample gamma emitter MDC requirements of Table 4.11-2, Item D. This change is considered to be editorial in that the parenthetical phrase in the table is inconsistent with note "g".

- 14) Changes to Technical Specification 5.1.3, Figures 5.1-3 and 5.1-4 (Both Units 1 and 2)

The existing Technical Specification figures reflect the Training/EOF Center as not complete. The Training/EOF Center is complete and the figures have been revised to appropriately reflect its completion. This is considered to be an editorial correction.

- 15) Change to Technical Specification 6.9.1.10 (Both Units 1 and 2)

As a result of NRC Management changes, the existing Technical Specification reference to the Director, Office of Management and Program Analysis is inappropriate. Alabama Power Company, after consultation with the NRC Staff, proposes to revise the reference to Director, Office of Resource Management. This is considered to be an editorial correction.

16) Change to Technical Specification 6.10.2.i (Both Units 1 and 2)

Technical Specification 6.10.2 describes the records which must be retained for the life of the Unit Operating License and Specification 6.10.1 describes the records which need be retained for only 5 years. Ambiguity exists in that the Operations Quality Assurance Policy Manual (OQAPM) covers (among other things) activities which are specifically described as requiring 5 year record retention but Specification 6.10.2.i currently implies that all quality assurance records addressed in the OQAPM should be retained for the life of the Operating License. Alabama Power Company, after consultation with the NRC Staff, proposes to clarify Specification 6.10.2.i to require the retention of safety related quality assurance records that are required by the OQAPM but are currently not specifically described in 6.10.1. This is considered to be an editorial clarification.

ATTACHMENT 2
Proposed Changes to Technical Specification Pages

<u>Unit 1</u>	<u>Revision</u>
Page 3/4 3-59	Replace
Page 3/4 3-60	Replace
Page 3/4 3-60a	Replace
Page 3/4 5-8	Replace
Page 3/4 7-16	Replace
Page 3/4 7-17a	Replace
Page 3/4 7-84	Replace
Page 3/4 7-87	Replace
Page 3/4 7-88	Replace
Page 3/4 7-89	Replace
Page 3/4 7-91	Replace
Page 3/4 7-91a	Add
Page 3/4 7-93	Replace
Page 3/4 9-16	Replace
Page 3/4 11-4	Replace
Page 3/4 11-9	Replace
Page 3/4 11-11	Replace
Page B 3/4 6-2	Replace
Page 5-4	Replace
Page 5-5	Replace
Page 6-19	Replace
Page 6-21	Replace

<u>Unit 2</u>	<u>Revision</u>
Page 3/4 3-59	Replace
Page 3/4 3-60	Replace
Page 3/4 3-60a	Replace
Page 3/4 5-8	Replace
Page 3/4 7-16	Replace
Page 3/4 7-17a	Replace
Page 3/4 7-54	Replace
Page 3/4 7-57	Replace
Page 3/4 7-58	Replace
Page 3/4 7-59	Replace
Page 3/4 7-61	Replace
Page 3/4 7-61a	Add
Page 3/4 7-63	Replace
Page 3/4 8-18	Replace
Page 3/4 8-19	Replace
Page 3/4 8-20	Replace
Page 3/4 9-16	Replace
Page 3/4 11-4	Replace
Page 3/4 11-9	Replace
Page 3/4 11-11	Replace
Page B 3/4 8-2	Replace
Page 5-4	Replace
Page 5-5	Replace
Page 6-19	Replace
Page 6-21	Replace