

Mailing Address

Alabama Power Company
600 North 18th Street
Post Office Box 2641
Birmingham, Alabama 35291
Telephone 205 783-6090

R. P. McDonald
Senior Vice President
Flintridge Building



Alabama Power

the southern electric system

November 14, 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
Response to Request for Additional Information
Generic Letter 83-28, Item 3.2.2

Gentlemen:

By letter dated September 10, 1985, the NRC requested Alabama Power Company (APCo) to provide additional information regarding Section 3.2.2 of Generic Letter 83-28. Attached is the APCo response to this request.

Yours truly,

R. P. McDonald

RPM/RGW:ddb-D17
Attachment

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

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Attachment

Item 3.2.2 - Post-Maintenance Testing (All Other Safety Related Components)

Position

Licensees and applicants shall submit the results of their check of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications where required.

NRC Position - Item 3.2.2

The licensee's responses to this Action Item do not meet the intent of Generic Letter 83-28 without further clarification. The licensee has not performed a review of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications and has not provided adequate justification for this review not being performed.

APCo Response - Item 3.2.2

The initial development of test and maintenance procedures for Farley Nuclear Plant (FNP) were based on recommendations provided by vendors in the form of technical manuals, recommendations provided by the Architect/Engineers, recommendations made by vendor representatives during startup and testing of equipment, and recommendations made by engineers with expertise in startup and operation of nuclear power facilities.

Over the course of plant life, procedures have been modified to be consistent with the plant specific application of equipment. Changes to the procedures are based on engineering review and maintenance experience. Alabama Power Company (APCo) procedures require that technical bulletins, solicited and unsolicited, be reviewed by APCo personnel to determine the applicability of the recommendation for FNP. This review is based on experience gained over the course of plant life and engineering judgement. Vendor technical representatives are frequently consulted by APCo to aid in determining the proper operation and maintenance of equipment. In certain cases APCo has obtained the services of an outside consultant to aid in the resolution of identified problems associated with equipment at FNP.

In order to ensure that maintenance and test procedures for equipment furnished by the major suppliers at FNP are maintained current, APCo has developed a contact program with Westinghouse Corporation, (the NSSS supplier for FNP), Colt Industries, (the diesel generator vendor for FNP), and General Electric Corporation. Each of these vendors has agreed to participate in the program in return for an annual fee from APCo. Technical bulletins issued by each of these vendors are transmitted to APCo with an acknowledgment receipt. Upon receipt of the information, APCo returns the acknowledgment to verify proper receipt of the documentation. In addition to the acknowledgment receipt of vendor information, each vendor has supplied APCo with a list of all previously issued recommendations applicable to FNP and, on

an annual basis, a cumulative listing is issued to APCo summarizing bulletins applicable to FNP issued during the course of the year. This contact program ensures APCo that all technical information issued by these vendors has been reviewed for applicability to FNP since commencement of commercial operations. In addition, Colt Industries has been contracted by APCo to review and update all Colt diesel generator technical manuals applicable to FNP. This effort is scheduled for completion in February, 1986.

In addition to the formal contact program developed with Westinghouse, Colt and General Electric, it has been the practice of APCo to review vendor technical bulletins which were applicable to FNP. After issuance of Generic Letter 83-28 by the NRC, APCo incorporated this practice into formal procedures which provide guidance to personnel on the receipt, review and appropriate actions to be taken as a result of bulletins applicable to FNP.

As stated in the APCo response dated February 15, 1984, APCo operates FNP under Standard Technical Specifications. The FNP Technical Specifications do not provide procedures for testing, but rather provide the minimum requirements under which FNP may operate. APCo sees no direct connection between the Technical Specification surveillance requirements for testing and vendor recommendations or test guidance.

Based on the contact programs established with Westinghouse, General Electric and Colt Industries, the procedures currently utilized by APCo for review of solicited and unsolicited vendor recommendations, coupled with eight years of expertise gained by FNP personnel, it is APCO's belief that the intent of Item 3.2.2 is satisfied.