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NEL-00-0153

Docket Nos.: 50-348  
50-364

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555 - 0001

Joseph M. Farley Nuclear Plant  
Comments on SECY- 99-182 "Assessment of the Impact of  
Appendix R Fire Protection Exemptions on Fire Risk" and  
10CFR50, Appendix R Exemption Withdrawal

Ladies and Gentlemen:

By letter dated September 10, 1986 the NRC staff approved Alabama Power Company exemption requests 1-035 and 1-037 for 10 CFR 50 Appendix R requirements. These exemptions apply to the A and B train electrical penetration rooms at FNP Unit 1. These rooms are located in fire zones 1-035 and 1-034.

By letter dated April 27, 2000 the NRC staff requested that SNC provide a schedule for comments on the limited scope study transmitted via SECY-99-182 "Assessment of the Impact of Appendix R Fire Protection Exemptions on Fire Risk." In a letter dated May 31, 2000, SNC proposed to provide comments on the SECY by August 30, 2000.

This study categorized 10 CFR 50 Appendix R exemptions for Farley and a number of other nuclear power plants and attempted to assign risk significance to the exemptions. Exemptions were classified as either "potentially significant," "indeterminate risk," "small risk" or "very small risk." Farley exemptions 1-035 and 1-037 were designated as "potentially significant." The conditions that were exempted were lack of one hour rated fire barrier and lack of an automatic fire suppression system in the electrical penetration rooms. At the time these exemptions were submitted, a fire in either of the electrical penetration rooms could have affected redundant safe shutdown equipment. Since that time, actions were taken such that there is no longer a requirement for the one hour rated fire barriers or the automatic fire suppression system in these areas. These actions included rerouting cables for redundant safe shutdown equipment, removing power from some equipment, and implementation of operator actions. As a result of these actions exemptions 1-035 and 1-037 are no longer required and SNC requested that they be deleted.

If there are questions please advise. This letter contains no NRC commitments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D Morey".

Dave Morey  
EWC:maf.exemptionreqwith.DOC

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U. S. Nuclear Regulatory Commission

cc: Southern Nuclear Operating Company  
Mr. L. M. Stinson, General Manager – Farley

U. S. Nuclear Regulatory Commission, Washington, D. C.  
Mr. L. M. Padovan, Licensing Project Manager – Farley

U. S. Nuclear Regulatory Commission, Region II  
Mr. L. A. Reyes, Regional Administrator  
Mr. T. P. Johnson, Senior Resident Inspector – Farley