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Vice President  
Farley Project

**Southern Nuclear  
Operating Company, Inc.**  
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Birmingham, Alabama 35201  
Tel 205.992.5131



July 5, 2001

Docket Nos.: 50-348  
50-364

NEL-01-0120

Joseph M. Farley Nuclear Plant  
Inservice Inspection Relief Request Number RR-44 Units 1 and 2  
Response to Request for Additional Information

Ladies and Gentlemen:

By letter dated December 18, 2000, Southern Nuclear Operating Company (SNC) submitted relief requests related to the Farley Units 1 and Unit 2 Inservice Inspection Programs. This letter responds to NRC questions raised during a May 17, 2001 telephone call.

In RR-44 for Unit 1 and Unit 2, SNC proposed eliminating the visual examination for the RPV supports on the basis that the RPV supports are inaccessible due to being encased in concrete. Attached are revised copies of RR-44 wherein SNC proposes to accomplish a "best-effort" visual examination under the provisions of 10CFR50.55a(g)(6)(i).

There are no commitments contained in this letter. If you have any questions, please advise.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "DM Morey", is written over the typed name.

Dave Morey

CWD/maf: raiforrr44-47-B-06-22.doc

**Attachments:**

- Attachment 1: REVISED COPY SOUTHERN NUCLEAR OPERATING COMPANY  
FARLEY UNIT 1 THIRD 10-YEAR INTERVAL REQUEST FOR RELIEF NO. RR-44
- Attachment 2: REVISED COPY SOUTHERN NUCLEAR OPERATING COMPANY  
FARLEY UNIT 2 UPDATED PROGRAM REQUEST FOR RELIEF NO. RR-44

A047

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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. F. Rinaldi, 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

Attachment 1

REVISED COPY

SOUTHERN NUCLEAR OPERATING COMPANY  
FARLEY UNIT 1  
THIRD 10-YEAR INTERVAL  
REQUEST FOR RELIEF NO. RR-44

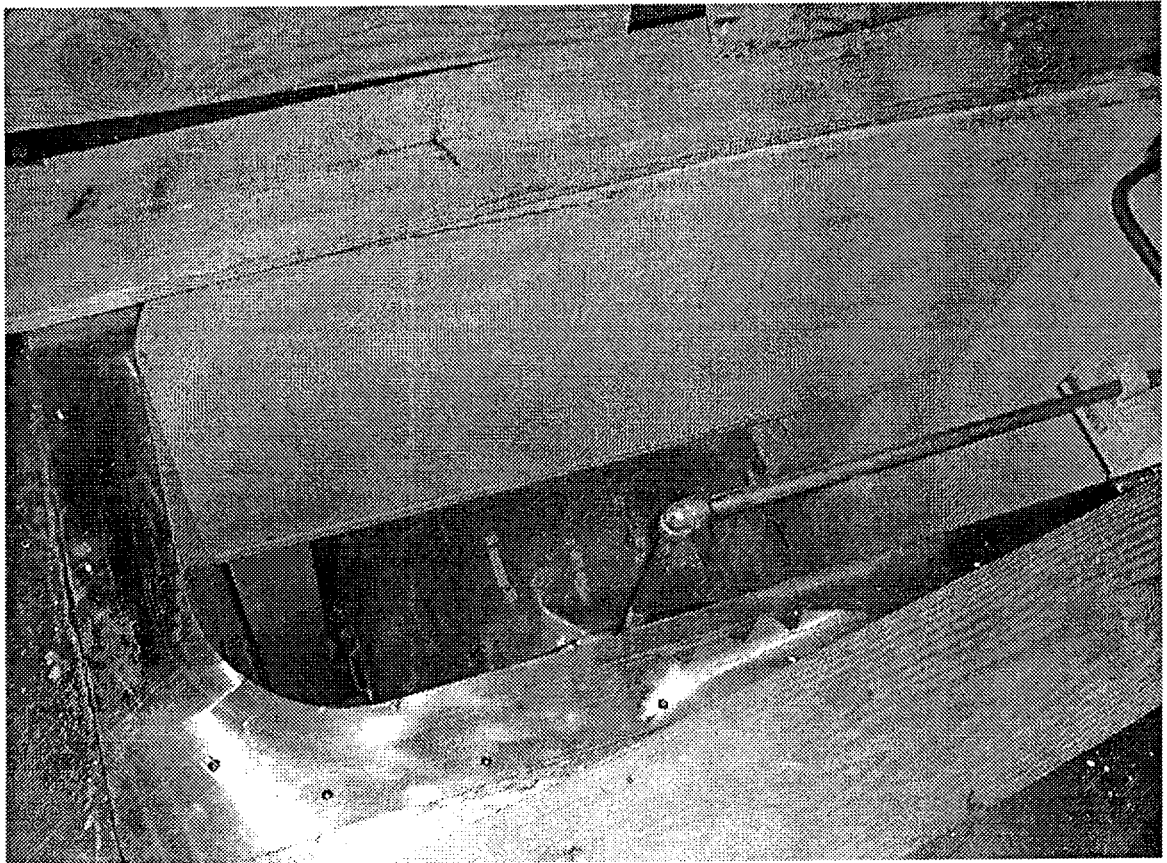
REVISED COPY

SOUTHERN NUCLEAR OPERATING COMPANY  
FARLEY UNIT 1  
THIRD 10-YEAR INTERVAL  
REQUEST FOR RELIEF NO. RR-44

- I. System/Component(s) for Which Relief is Requested: Reactor Pressure Vessel Supports.
- II. Code Requirement: Item No. F1.40, Category F-A, Table 2500-1 of ASME Section XI Code Case N-491-1 requires a VT-3 visual examination for Supports Other than Piping Supports.
- III. Code Requirement for Which Relief is Requested: Relief is requested from meeting the required coverage for these six vessel supports.
- IV. Basis for Relief: The reactor pressure vessel supports are essentially inaccessible for VT-3 examination. The configuration of the support is such that it is almost entirely encased in concrete. A small section of one part of the support extends out of the concrete immediately under the reactor vessel nozzle support bosses. Access to this small section of the support to perform a direct VT-3 examination is prevented by the restrictive quarters within the "sand-box" area ( See Figure 1 ). A remote VT-3 visual examination of the support and associated components will be performed with a video camera. This method of remote visual examination permits coverage to the extent possible while minimizing the radiation dose to the examination personnel. The visual examination of three vessel supports and associated components will be performed each five years.
- V. Alternate Examination: In addition to the VT-3 examination described above, a visual examination of the visible portion of the exterior concrete wall surrounding the reactor pressure vessel will be performed every five years to look for the general condition of the concrete and associated components.
- VI. Justification for Granting Relief: The concrete structure beneath and around the reactor pressure vessel nozzles prevents personnel access to the reactor pressure vessel supports. To obtain access to the supports would require a modified design and would be very expensive. The proposed periodic visual examinations will provide reasonable assurance of the continued structural integrity of these supports and the adjacent concrete. Denial of this relief request would cause an excessive burden upon SNC, as modification of the area underneath the reactor pressure vessel is impractical; therefore, approval should be granted pursuant to 10 CFR 50.55a(g)(6)(i).
- VII. Implementation Schedule: This request for relief is applicable to examinations performed during the Third Ten-Year Interval ending on November 30, 2007, using the 1989 Edition of ASME Section XI.
- VIII. Relief Request Status: This request for relief is awaiting NRC approval.

**FIGURE 1**  
**Relief Request RR-44**

**General Configuration of Farley Sand-box Areas**



This picture shows the general configuration of the sand-box areas for Farley-1 and -2. The Reactor Coolant system piping can be seen in the middle of the picture. Sufficient space exists for an individual to stand next to the piping but movement is very limited. Farley will use a video camera to perform a general visual examination of the accessible support structure and associated components.

Attachment 2

REVISED COPY

SOUTHERN NUCLEAR OPERATING COMPANY  
FARLEY UNIT 2  
UPDATED PROGRAM  
REQUEST FOR RELIEF NO. RR-44

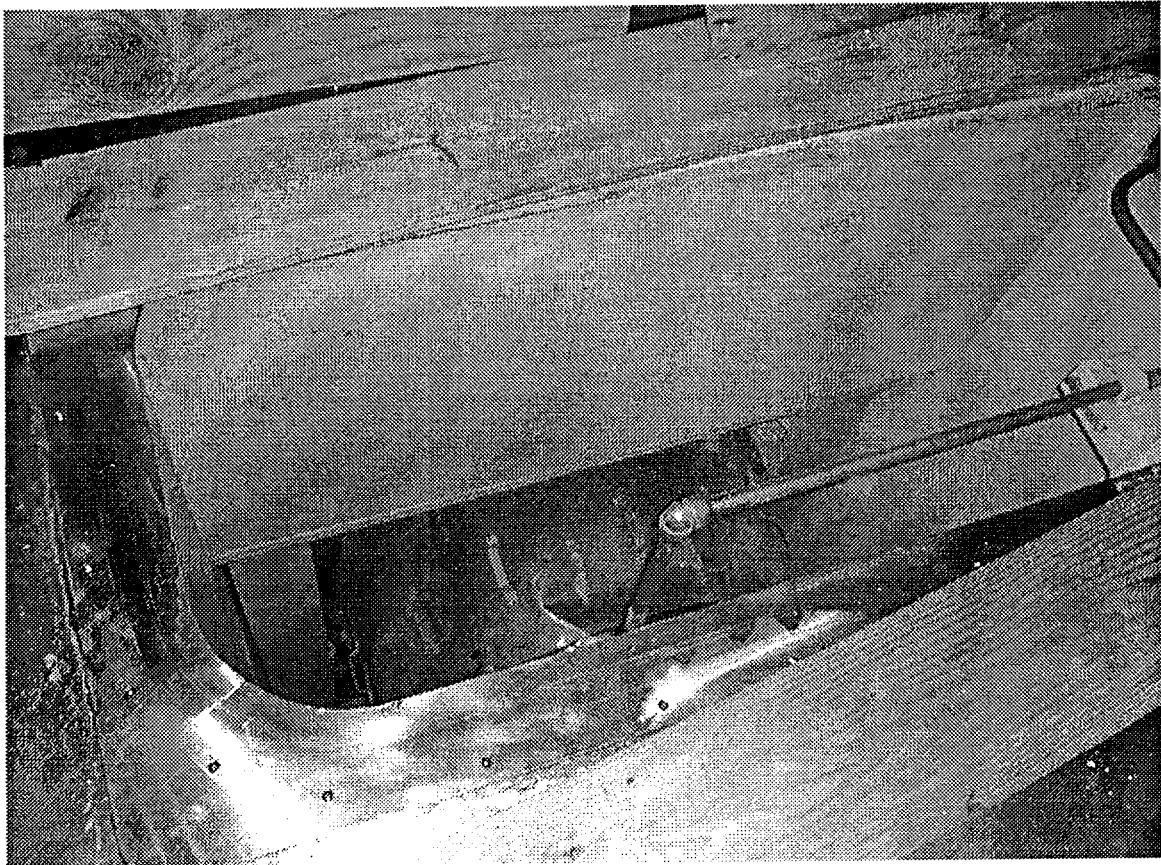
REVISED COPY

SOUTHERN NUCLEAR OPERATING COMPANY  
FARLEY UNIT 2  
UPDATED PROGRAM  
REQUEST FOR RELIEF NO. RR-44

- I. System/Component(s) for Which Relief is Requested: Reactor Pressure Vessel Supports.
- II. Code Requirement: Item No. F1.40, Category F-A, Table 2500-1 of ASME Section XI Code Case N-491-1 requires a VT-3 visual examination for Supports Other than Piping Supports.
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- V. Alternate Examination: In addition to the VT-3 examination described above, a visual examination of the visible portion of the exterior concrete wall surrounding the reactor pressure vessel will be performed every five years to look for the general condition of the concrete and associated components.
- VI. Justification for Granting Relief: The concrete structure beneath and around the reactor pressure vessel nozzles prevents personnel access to the reactor pressure vessel supports. To obtain access to the supports would require a modified design and would be very expensive. The proposed periodic visual examinations will provide reasonable assurance of the continued structural integrity of these supports and the adjacent concrete. Denial of this relief request would cause an excessive burden upon SNC, as modification of the area underneath the reactor pressure vessel is impractical; therefore, approval should be granted pursuant to 10 CFR 50.55a(g)(6)(i).
- VII. Implementation Schedule: This request for relief is applicable to the ISI examinations performed from December 1, 1997 to November 30, 2007, using the 1989 Edition of ASME Section XI.
- VIII. Relief Request Status: This request for relief is awaiting NRC approval.

**FIGURE 1**  
**Relief Request RR-44**

**General Configuration of Farley Sand-box Areas**



This picture shows the general configuration of the sand-box areas for Farley-1 and -2. The Reactor Coolant system piping can be seen in the middle of the picture. Sufficient space exists for an individual to stand next to the piping but movement is very limited. Farley will use a video camera to perform a general visual examination of the accessible support structure and associated components.