

Dave Morey
Vice President
Farley Project

**Southern Nuclear
Operating Company, Inc.**
Post Office Box 1295
Birmingham, Alabama 35201
Tel 205.992.5131



Energy to Serve Your WorldSM
10 CFR 50.90
NEL-02-0022

January 24, 2002

Docket Nos. 50-348
50-364

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Joseph M. Farley Nuclear Plant
Request to Revise Technical Specifications
Post Accident Sampling

Ladies and Gentlemen:

In accordance with the requirements of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) proposes to revise the Farley Nuclear Plant (FNP) Unit 1 and Unit 2 Technical Specifications (TS). The proposed amendment would delete TS 5.5.3, "Post Accident Sampling," to eliminate the requirements for a post accident sampling system. The proposed changes are consistent with the NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this TS improvement was announced in the Federal Register on October 31, 2000, as part of the Consolidated Line Item Improvement Process (CLIP).

Enclosure 1 provides the basis for the proposed changes. This includes a description of the proposed changes, the requested confirmation of applicability, plant-specific verifications and the no significant hazards determination. Enclosure 2 provides the existing TS and Bases pages marked-up to show the proposed changes, and Enclosure 3 provides clean-typed copies of the affected TS and Bases pages.

SNC requests approval of the proposed changes by July 1, 2002 with the amendment being implemented by December 31, 2002. The requested approval date was administratively selected to allow for NRC review, and the implementation date was selected to allow for revision of the necessary procedures to reflect elimination of the PASS.

This letter contains three commitments as discussed in Enclosure 1. These commitments are 1) establishment of contingency plans, 2) ensuring the capability for classifying fuel damage events, and 3) ensuring the capability to monitor radioactive iodines.

A001

A copy of the proposed changes has been sent to Dr. D. E. Williamson, the Alabama State Designee, in accordance with 10 CFR 50.91(b)(1).

Mr. D. N. Morey states that he is a Vice President of Southern Nuclear Operating Company and is authorized to execute this oath on behalf of Southern Nuclear Operating Company and that, to the best of his knowledge and belief, the facts set forth in this letter are true.

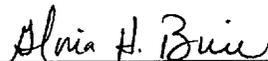
Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Dave Morey

Sworn to and subscribed before me this 24th day of Jan 2002



Notary Public

My Commission Expires: 6/7/05

kah/was: PASS NRC letter.doc

- Enclosure 1: Basis for Proposed Change
- Enclosure 2: Marked-up TS and Bases Pages
- Enclosure 3: Clean-typed TS and Bases Pages

U. S. Nuclear Regulatory Commission
Page 3

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

Alabama Department of Public Health
Dr. D. E. Williamson, State Health Officer

Enclosure 1
Joseph M. Farley Nuclear Plant
Request to Revise Technical Specifications
Post Accident Sampling

Basis for Proposed Change

Proposed Change

The proposed License amendment deletes the program requirements of the Joseph M. Farley Nuclear Plant (FNP) Units 1 and 2 Technical Specifications (TS) 5.5.3, "Post Accident Sampling." In addition, for the sake of completeness, the Bases for LCO 3.3.3, Post Accident Monitoring Instrumentation, Required Action D.1 are revised to remove a reference to the Post Accident Sampling System (PASS).

The proposed changes are consistent with NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366. The availability of this TS improvement was announced in the Federal Register, Vol. 65, No. 211, on October 31, 2000, (Pages 65018-65024) as part of the consolidated line item improvement process (CLIP).

Applicability of Published Safety Evaluation

Southern Nuclear Operating Company (SNC) has reviewed the safety evaluation published on October 31, 2000 as part of the CLIP. This verification included a review of the NRC staff's evaluation as well as the information provided to support TSTF-366 (i.e., WCAP-14986-A, Revision 2, "Post Accident Sampling System Requirements: A Technical Basis," submitted October 26, 1998, as supplemented by letters dated April 28, 1999, April 10, 2000 and May 22, 2000). SNC has concluded that the justifications presented in TSTF-366 and the safety evaluation prepared by the NRC staff are applicable to FNP Units 1 and 2 and justify this amendment for the incorporation of the changes to the FNP TS.

Optional Changes and Variations

SNC is not proposing any variations or deviations from the TS changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000.

The elimination of the PASS results in changes to the discussion in the Bases section for TS 3.3.3, "Post Accident Monitoring (PAM) Instrumentation." The current Bases mention the capability of the PASS as a backup for monitoring hydrogen concentration within containment in the event that two hydrogen monitor channels are inoperable. Proposed changes to the Bases for TS 3.3.3 are contained in Enclosure 2.

No Significant Hazards Determination

SNC has reviewed the no significant hazards consideration (NSHC) determination published on October 31, 2000 as part of the CLIP. SNC has concluded that the NSHC determination presented in the Federal Register, on October 31, 2000 (65 FR 65018) is applicable to FNP Units 1 and 2 and the NSHC determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

Verification and Commitments

As discussed in the notice of availability published in the Federal Register, Vol. 65, No. 211 on October 31, 2000 for this TS improvement, the following plant-specific verifications were performed:

Enclosure 1
Joseph M. Farley Nuclear Plant
Request to Revise Technical Specifications
Post Accident Sampling

Basis for Proposed Change

1. SNC will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be contained in plant procedures and implemented with the implementation of the license amendment. Establishment of contingency plans is considered a regulatory commitment.
2. The capability for classifying fuel damage events at the Alert level threshold has been established for FNP at radioactivity levels of 300 $\mu\text{Ci}/\text{gram}$ dose equivalent iodine. This capability will be described in plant procedures and implemented with the implementation of the license amendment. The capability for classifying fuel damage events is considered a regulatory commitment.
3. SNC has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability is described in our emergency plan implementing procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.

Environmental Evaluation

SNC has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000 as part of the CLIP. SNC has concluded that the staff's findings presented in that evaluation are applicable to FNP Units 1 and 2 and the evaluation is hereby incorporated by reference for this application.

Enclosure 2
Joseph M. Farley Nuclear Plant
Request to Revise Technical Specifications
Post Accident Sampling

Marked-up TS and Bases Pages

5.5 Programs and Manuals

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include recirculation portions of the Containment Spray, Safety Injection, and Chemical and Volume Control Systems, the Waste Gas System, the Reactor Coolant Sampling System, the Residual Heat Removal System, and the Containment Atmosphere Sampling System. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system with the exception of the waste gas system and the containment atmosphere sampling system which are "snoop" tested at refueling cycle intervals or less.

5.5.3

Post Accident Sampling

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- a. Training of personnel;
- b. Procedures for sampling and analysis; and
- c. Provisions for maintenance of sampling and analysis equipment.

Not Used →

5.5.4

Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;

(continued)

BASES

ACTIONS
(continued)

B.1

Condition B applies when the Required Action and associated Completion Time for Condition A are not met. This Required Action specifies initiation of actions in Specification 5.6.8, which requires a written report to be submitted to the NRC. This report discusses the results of the root cause evaluation of the inoperability, if performed, and identifies proposed restorative actions. This action is appropriate in lieu of a shutdown requirement since alternative actions are identified before loss of functional capability, and given the likelihood of unit conditions that would require information provided by this instrumentation.

C.1

Condition C applies when one or more Functions have two inoperable required channels (i.e., two channels inoperable in the same Function). Required Action C.1 requires restoring one channel in the Function(s) to OPERABLE status within 7 days. The Completion Time of 7 days is based on the relatively low probability of an event requiring PAM instrument operation and the availability of alternate means to obtain the required information. Continuous operation with two required channels inoperable in a Function is not acceptable because the alternate indications may not fully meet all performance qualification requirements applied to the PAM instrumentation. Therefore, requiring restoration of one inoperable channel of the Function limits the risk that the PAM Function will be in a degraded condition should an accident occur.

Condition C is modified by a Note that excludes hydrogen monitor channels.

D.1

Condition D applies when two hydrogen monitor channels are inoperable. Required Action D.1 requires restoring one hydrogen monitor channel to OPERABLE status within 72 hours. The 72 hour Completion Time is reasonable based on the backup capability of the ~~Post Accident Sampling System to monitor the hydrogen concentration for evaluation of core damage and to provide information for operator decisions.~~ Also, it is unlikely that a LOCA (which would cause core damage) would occur during this time.

other core
damage
assessment
capabilities
available

(continued)

Enclosure 3
Joseph M. Farley Nuclear Plant
Request to Revise Technical Specifications
Post Accident Sampling

Clean-typed TS and Bases Pages

5.5 Programs and Manuals

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include recirculation portions of the Containment Spray, Safety Injection, and Chemical and Volume Control Systems, the Waste Gas System, the Reactor Coolant Sampling System, the Residual Heat Removal System, and the Containment Atmosphere Sampling System. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system with the exception of the waste gas system and the containment atmosphere sampling system which are "snoop" tested at refueling cycle intervals or less.

5.5.3 Not Used

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;

(continued)

BASES

ACTIONS
(continued)

B.1

Condition B applies when the Required Action and associated Completion Time for Condition A are not met. This Required Action specifies initiation of actions in Specification 5.6.8, which requires a written report to be submitted to the NRC. This report discusses the results of the root cause evaluation of the inoperability, if performed, and identifies proposed restorative actions. This action is appropriate in lieu of a shutdown requirement since alternative actions are identified before loss of functional capability, and given the likelihood of unit conditions that would require information provided by this instrumentation.

C.1

Condition C applies when one or more Functions have two inoperable required channels (i.e., two channels inoperable in the same Function). Required Action C.1 requires restoring one channel in the Function(s) to OPERABLE status within 7 days. The Completion Time of 7 days is based on the relatively low probability of an event requiring PAM instrument operation and the availability of alternate means to obtain the required information. Continuous operation with two required channels inoperable in a Function is not acceptable because the alternate indications may not fully meet all performance qualification requirements applied to the PAM instrumentation. Therefore, requiring restoration of one inoperable channel of the Function limits the risk that the PAM Function will be in a degraded condition should an accident occur.

Condition C is modified by a Note that excludes hydrogen monitor channels.

D.1

Condition D applies when two hydrogen monitor channels are inoperable. Required Action D.1 requires restoring one hydrogen monitor channel to OPERABLE status within 72 hours. The 72 hour Completion Time is reasonable based on other core damage assessment capabilities available to provide information for operator decisions. Also, it is unlikely that a LOCA (which would cause core damage) would occur during this time.

(continued)