

December 12, 2003

Mr. J. B. Beasley, Jr.
Vice President
Southern Nuclear Operating Company
Post Office Box 1295
Birmingham, Alabama 35201

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2, LICENSE RENEWAL
APPLICATION

Dear Mr. Beasley:

By letter dated September 12, 2003, Southern Nuclear Operating Company, Inc. (SNC or the applicant) submitted an application pursuant to 10 CFR Part 54, to renew the operating licenses for Joseph M. Farley Nuclear Plant (FNP), Units 1 and 2, for review by U.S. Nuclear Regulatory Commission's (NRC). The NRC staff are reviewing the information contained in the license renewal application (LRA) and have identified, in the enclosure, areas where additional information is needed to complete the review. Specifically, the enclosed requests for additional information (RAIs) are from Section 2.2, Plant Level Scoping Results, Section 2.3.3.2, Spent Fuel Storage, and Section 2.3.3.20, Oil-Static Cable Pressurization System.

These RAIs have been provided to Mr. Jan Fridrichsen of your staff on November 6, 2003. The NRC staff have discussed draft versions of these RAIs, via a conference call, to provide clarifications to the SNC staff on December 3, 2003. Your responses to these RAIs are requested within 30 days from date of this letter. Mr. Fridrichsen has agreed to this request. If needed, the NRC staff is willing to meet or discuss with SNC again prior to the submittal of the applicant's responses to provide clarifications to the staff's RAIs.

If you have any questions, please contact me at 301-415-1315 or e-mail ty11@nrc.gov.

Sincerely,

/RA/

Tilda Liu, Project Manager
License Renewal Section A
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos. 50-348 and 50-364

Enclosure: As stated

cc w/encl: See next page

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Sincerely,

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Tilda Liu, Project Manager
License Renewal Section A
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos. 50-348 and 50-364

Enclosure: As stated

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**JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2
LICENSE RENEWAL APPLICATION
REQUEST FOR ADDITIONAL INFORMATION (RAI)**

Section 2.2: Plant Level Scoping Results

RAI 2.2-1

In a comparison of the Farley Nuclear Plant (FNP) units, the staff's review finds that the FNP license renewal application (LRA) does not identify the design differences in the systems and components for FNP Unit 1 compared to Unit 2. The FNP UFSAR Section 1.1.2 states that, "the two units are essentially the same, and the descriptions of one unit are interpreted as applying to both units. Differences between the two units, and particularly structures, systems, and components which are shared between the two units, are specifically pointed out." Updated Final Safety Analysis Report (UFSAR) Section 1.2.2 lists the systems, spaces and equipment shared by the two units. A preliminary comparison of the Units 1 and 2 license renewal boundary drawings for certain systems indicates that corresponding components considered within scope of license renewal for one unit are considered out of scope for the other unit. As an example, consider the primary temperature elements 2293I and 2293J at location E6 on both boundary drawings D-175007L (Unit 1) and D-205007L (Unit 2). These elements are considered within scope on boundary drawing D-175007L for Unit 1, but out of scope on boundary drawing D-205007L for Unit 2.

Describe the design differences between the systems and components, together with the associated current licensing bases for Units 1 and 2. Explain how these differences have been addressed in the scoping and screening review process for the corresponding systems of the two units.

RAI 2.2-2

According to the legend of license renewal boundary drawing D-506450L, Sheet 1, components within the scope of license renewal are shown in red highlight. It is also apparent from a comparison of component types subject to an aging management review (AMR), listed in Section 2 tables of the LRA, to those highlighted in the boundary drawings, that many of the components shown in red highlight (i.e., pressure instrumentation) are not subject to an AMR; that is, these components were screened out. The FNP LRA does not provide another means of identifying the specific components, which comprise the component types (or groups) subject to an AMR. Such identifications provide the end results of the scoping and screening review process. This information is needed for the staff to determine whether the specific components (which comprise the component types) have been properly identified as being subject to an AMR. This is in accordance with the requirements of 10 CFR 54.21(a)(1).

Provide documentation (either via tables or additional drawings) that would allow the staff to identify the specific components (comprise of component types) that are within the scope of license renewal and subject to an AMR. If tables are used, they should identify the specific components which comprise the component types for each system by component name, identification number, and drawing(s) where they are located.

RAI 2.2-3

In the FNP LRA, systems are identified by “LRA system” name. The LRA systems are identified in Table 2.2-1 and license renewal boundary drawing D-506450L, Sheet 1. The LRA systems (which use the “LRA system” nomenclature) may contain all or part of several FNP systems (which use the “traditional” FNP nomenclature). On page 2.2-1 of the FNP LRA, the applicant states that this change in nomenclature was implemented for ease of review and comparison to NUREG-1801, the GALL report. However, this nomenclature change introduces difficulty in the staff’s review of the scoping and screening results, because the FNP UFSAR and other CLB documentation refers to systems by the traditional nomenclature. In addition, P&IDs, and pipe runs and components shown on license renewal boundary drawings are labeled using a three to six letter abbreviation (system code) based on their traditional system designations.

In order to facilitate the staff’s scoping and screening review, provide a complete listing of the traditional nomenclature of FNP systems (both in-scope and out-of-scope) and system codes used as piping and component identifiers. This list should identify which LRA system, if any, is evaluated for the purpose of license renewal.

RAI 2.2-4

FNP license renewal boundary drawing, D-506447L, identifies by room numbers the locations of safety-related components that have a potential for damage from a spatial interaction for each system. Note 3 of this boundary drawing states that the systems and rooms as identified contain non-safety-related components which may be in proximity of safety-related components. However, the staff cannot identify the corresponding rooms from the room numbers that are given.

In order to facilitate the staff’s scoping and screening review, provide drawings or descriptive information that identifies the rooms by room numbers. This information should also identify the safety-related systems that contain safety-related components which may be adversely impacted by failure of non-safety-related components (brought into scope of license renewal in accordance with the requirements of 10 CFR 54.4(a)(2)).

Section 2.3.3.2: Spent Fuel Storage

RAI 2.3.3.2-1

Section 9.1.2.1 of the FNP UFSAR describes a transport container with a pellet canister trap and a fuel rod storage canister as additional storage containers for spent fuel rods and fuel rod debris. These storage containers provide the intended functions of radiation shielding and debris protection. Justify the exclusion of these components from the scope of license renewal and being subject to an AMR in accordance with the requirements of 10 CFR 54.4(a) and 10 CFR 54.21(a)(1), respectively.

RAI 2.3.3.2-2

License renewal boundary drawings D-175043L (Unit 1) and D-205043L (Unit 2) at location D9 show strainers on the spent fuel pool cooling system suction and supply lines as outside the scope of license renewal. Degraded or blocked strainers could impair the performance of the

decay heat removal intended function. Justify the exclusion of these components from the scope of license renewal and being subject to an AMR in accordance with the requirements of 10 CFR 54.4(a) and 10 CFR 54.21(a)(1), respectively.

Section 2.3.3.20: Oil-Static Cable Pressurization System

RAI 2.3.3.20-1

Magnetic level indicators are shown on license renewal boundary drawing D-372816L at locations B3 and B9 and are shown to be within the scope of license renewal. However, magnetic level indicators are not listed in LRA Table 2.3.3.20. These components provide a pressure boundary intended function. Clarify whether the pressure retaining boundary of the magnetic level indicators is subject to an AMR. If not, justify the exclusion of these components from being subject to an AMR in accordance with the requirements of 10 CFR 54.21(a)(1).

RAI 2.3.3.20-2

- A. License renewal boundary drawing D-372816L shows an unidentified component (equipment ID: 1RV2, 1RV1, 2RV2 and 2RV1) at locations D3, D5, D9 and D10 respectively, to be within the scope of license renewal. These components are not listed in the Bechtel Standard P&ID Legend Drawing D-175016, Sheets 1, 2 and 3. Identify these components, and clarify if they are subject to an AMR. If not, justify the exclusion of these components from being subject to an AMR in accordance with the requirements of 10 CFR 54.21(a)(1).
- B. License renewal boundary drawing D-372816L shows unidentified components 1RD and 2RD at locations B5 and B10 respectively. These components are not listed in the Bechtel Standard P&ID Legend drawing D-175016 sheets 1, 2 and 3. These components should be within the scope of license renewal and included in LRA Table 2.3.3.20, since they provide a pressure boundary intended function. Identify these components, and clarify if they are within the scope of license renewal and subject to an AMR. If not, justify the exclusion of these components from the scope of license renewal and being subject to an AMR in accordance with the requirements of 10 CFR 54.4(a) and 10 CFR 54.21(a)(1), respectively.