

February 26, 2004

LICENSEE: Southern Nuclear Operating Company
FACILITY: Joseph M. Farley Nuclear Plant, Units 1 and 2
SUBJECT: SUMMARY OF TELEPHONE CONFERENCES ON FEBRUARY 13, 17, AND 18, 2004, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND THE SOUTHERN NUCLEAR OPERATING COMPANY CONCERNING DRAFT REQUESTS FOR ADDITIONAL INFORMATION ON JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2, LICENSE RENEWAL APPLICATION (TAC NOS. MC0774 AND MC0775)

The U.S. Nuclear Regulatory Commission staff and representatives of Southern Nuclear Operating Company (SNC or the applicant) held telephone conferences on February 13, 17, and 18, 2004, to discuss the draft requests for additional information (D-RAIs) concerning the Joseph M. Farley Nuclear Plant (FNP) license renewal application.

The conference calls were useful in clarifying the intent of the staff's questions. On the basis of the discussion, the applicant was able to understand the staff's questions. No staff decisions were made during the telephone conferences. In some cases, the applicant agreed to provide information for clarification.

Enclosure 1 provides a list of the telephone conference participants. Enclosure 2 contains a listing of the D-RAIs discussed with the applicant, including a brief description on the status of the items. The applicant has had an opportunity to review and comment on this summary.

/RA/ Samson Lee for

Tilda Y. 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

Enclosures: As stated

cc w/enclosures: See next page

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**LIST OF PARTICIPANTS FOR TELEPHONE CONFERENCES ON
DRAFT REQUESTS FOR ADDITIONAL INFORMATION**

February 13, 2004

<u>Participants</u>	<u>Affiliation</u>
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Jim Medoff	NRC
Ken Chang	NRC
Mark Lintz	NRC
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Jon Hornbuckle	SNC

February 17, 2004

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George Morris	NRC
Duc Nguyen	NRC
Jim Leivo	ISL
Jan Fridrichsen	SNC
Mike Macfarlane	SNC
Chuck Pierce	SNC
Jeff Mulvehill	SNC
Mark Crisler	SNC
Partha Ghosal	SNC
Cary Martin	SNC

February 18, 2004

<u>Participants</u>	<u>Affiliation</u>
Tilda Liu	NRC
David Jeng	NRC
Richard Morante	BNL
Jan Fridrichsen	SNC
Mike Macfarlane	SNC
Jeff Mulvehill	SNC
Mark Crisler	SNC
Partha Ghosal	SNC
Cary Martin	SNC
Bill Evans	SNC

REVIEW OF LICENSE RENEWAL APPLICATION (LRA) FOR FARLEY UNITS 1 AND 2

February 13, 2004

The NRC staff and representatives of SNC held a telephone conference on February 13, 2004, to discuss the applicant's proposed aging management programs (AMPs) at FNP, Units 1 and 2. The subject AMPs were Reactor Vessel Surveillance Program and Reactor Vessel Internals Program. A summary of the issues discussed and the applicant's proposed actions are presented below.

B.3.4, Reactor Vessel Surveillance Program

The staff and the applicant discussed the reactor vessel capsule withdrawal schedule. The applicant stated that it planned to submit the withdrawal schedule under 10 CFR Part 50, Appendix H, requirements. The staff indicated that the schedule needed to be submitted under 10 CFR Part 54. The staff and the applicant agreed that the statutory regulatory requirement would need to be clarified with the Office of General Counsel (OGC). This issue will be discussed again between the staff and the applicant at a future conference call.

B.5.1, Reactor Vessel Internals Program

The staff discussed an alternate option for defining the component locations and examinations that will be performed as part of implementation of the applicant's Reactor Vessel (RV) Internals Program. During this phone call, the staff informed the applicant that this alternative viable option would use a commitment for industry participation (including implementation of industry recommendations) and submittal of an inspection plan for the RV internals as the basis for defining the component locations and inspections that will be implemented as part of the AMP. The applicant indicated that it would discuss the applicability of this option to the Farley LRA with its management. This issue will be discussed again between the staff and the applicant at a future conference call.

REVIEW OF LICENSE RENEWAL APPLICATION (LRA) FOR FARLEY UNITS 1 AND 2 DRAFT REQUESTS FOR ADDITIONAL INFORMATION (D-RAIs)

February 17, 2004

Section 3.6: Aging Management of Electrical Components

Draft-RAI 3.6.2-1

Table 3.6.2-1, Electrical Components - Summary of Aging Management Review, discusses the intended functions and aging effects and aging management programs associated with the oil-static cables. Under the "Pressure Boundary" function, the AMPs referenced are Buried Piping and Tank Inspection Program [B.5.4] and External Surfaces Monitoring Program [B.5.3]. These programs list the Oil-Static Cable Pressurization System. Under the "Provide Electrical Connections" function, it states that there is no aging effect and no AMP is required. The table does not address the effect of aging on the oil impregnated paper insulation system and the terminations at each end of the cable.

- a. LR boundary drawing D-372816L does not appear to include the oil-static cable. Confirm that the boundary of the oil-static cable pressurization system includes the oil-static cable. If not, describe the AMP that covers the oil-static cable.
- b. Describe how the aging effects on the oil-static cable insulation system is to be monitored. Provide operating experience with this cable system at FNP.

Response: The applicant indicated that the question is clear. This D-RAI will be sent as a RAI. Specifically, the applicant stated the following:

- a. The applicant stated that the oil-static cable itself is shown on the one-line diagrams referenced in Section 3.6, Aging Management of Electrical Components, of the application. The aging management for the pipe surrounding the oil-static cable is covered by the Buried Pipe Aging Management Program.
- b. The applicant stated that it will research the Southern Company electrical system to identify operating experiences on oil-static cable insulation system to support its conclusion.

Section 4.4: Environmental Qualification of Electrical Equipment

Draft-RAI 4.4-1

The FNP LRA, Table 4.4, List of EQ Packages, lists the Electrical Penetration Assemblies in a number of different packages (09B, 09C, 09E, 18 and 42). SNC stated during the Aging Management Program Audit conducted from November 3 to 7, 2003, and confirmed in its letter dated December 5, 2003, NL-03-2418, Enclosure 1, Electrical Question E2, that the 4160 kV power penetrations were not safety related and their electrical connection functions were covered under the Non-EQ Cables and Connections Program. The response did not identify any other non-EQ penetrations in low voltage power control or instrumentation applications. The response also did not address the pressure/fission product boundary functions of the electrical penetrations.

- a. Confirm that all electrical penetration assemblies (other than the 4160 kV power penetrations described in your letter) are included in the different packages listed in Table 4.4 of the LRA.
- b. Identify where the pressure/ fission product boundary functions of the EQ and Non-EQ electrical penetrations assemblies are evaluated and how those functions will be maintained.
- c. Confirm that the electrical penetrations assemblies associated with the personnel air locks, if any, are either included in one of the penetration items listed in Table 4.4 of the LRA or provide an evaluation that addresses the license renewal requirements.

Response: The applicant stated that it plans to revise Table 2.4.1 in the LRA to include mechanical portion of the electrical penetration assemblies, so that it would also help clarify this D-RAI. The applicant indicated that the question is clear. This D-RAI will be sent as a RAI.

REVIEW OF LICENSE RENEWAL APPLICATION (LRA) FOR FARLEY UNITS 1 AND 2 DRAFT REQUESTS FOR ADDITIONAL INFORMATION (D-RAIs)

February 18, 2004

Section 2.4.1: Containment Structures

Draft-RAI 2.4-7

LRA Section 2.4.1 "Containment Structure" contains the following discussion related to electrical penetrations through containment:

2.4.1.3 Penetrations

In general, a containment penetration consists of a sleeve embedded in the concrete wall or floor and welded to the containment liner plate. Loads on the penetration are transferred to the containment structure. The process pipe or cable feed-through assembly passes through the sleeve and is seal welded to the sleeve via an appropriate adapter. Additional detail is provided below.

Electrical Penetrations

Electrical penetrations consist of a sleeve that passes through the containment boundary. The sleeve is welded to the containment liner plate. A cable feed-through assembly is inserted in the sleeve and welded to the sleeve inside containment for Conax and GE type penetrations. The feed-through assembly is screwed to the clip angle for a Westinghouse type penetration.

LRA Table 2.2-1f "Systems and Structures within the Scope of License Renewal – Electrical Components" specifically lists "(Electrical) Containment Penetrations". However, LRA Table 2.5.1 "Electrical Component Types Subject to Aging Management Review and their Intended Functions" does not specifically identify the cable feed-through assembly.

LRA Table 2.4.1 "Containment Structure Component Types Subject to Aging Management Review and their Intended Functions" does not identify any component group that would obviously include the cable feed-through assembly.

From the information in the LRA, the staff cannot determine whether the applicant is treating the cable feed-through assembly as a component of the containment structure or as an electrical component. The staff requests the applicant to clarify its treatment of the cable feed-through assembly, and also to identify where the AMR is located in the LRA.

Response: The applicant stated that it plans to modify Tables 2.4.1 and 3.5.2 in the LRA to include electrical assemblies. The applicant indicated that the question is clear. This D-RAI will be sent as a RAI.

Joseph M. Farley Nuclear Plant

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