March 12, 2004

LICENSEE: Southern Nuclear Operating Company

FACILITY: Joseph M. Farley Nuclear Plant, Units 1 and 2

SUBJECT: SUMMARY OF TELEPHONE CONFERENCES ON MARCH 1, 2, AND 3, 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 March 1, 2, and 3, 2004, to discuss requests for additional information (RAIs), draft requests for additional information (D-RAIs), and questions 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 better 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 RAIs, D-RAIs, questions 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/

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

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March 12, 2004

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SUBJECT: SUMMARY OF TELEPHONE CONFERENCES ON MARCH 1, 2, AND 3, 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)

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/***RA***/

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Enclosures: As stated

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REVIEW OF LICENSE RENEWAL APPLICATION (LRA) FOR FARLEY UNITS 1 AND 2 APPLICANT'S RESPONSES TO REQUESTS FOR ADDITIONAL INFORMATION (RAI)

March 1, 2004

The NRC staff and representatives of Southern Nuclear Operating Company (SNC) held a telephone conference on March 1, 2004, for a followup discussion on the telephone conference held on February 5, 2004, relating to the applicant's response, dated January 9, 2004, for RAI 2.1-1. On the basis of the discussion, the applicant plans to revise some of its responses. A summary of the questions discussed and the applicant's proposed actions are presented below.

RAI 2.1-1
10 CFR 54.4(a)(2), Scoping Criteria for Non-safety Related Systems, Structures, or Components (SSCs)

20 ft. Radius
This issue was discussed during the last telephone conference on February 5, 2004, at which time the staff asked what analysis that Joseph M. Farley Nuclear Plant (FNP), Units 1 and 2, had in order to support the criteria that, for all low energy systems with the potential for interaction (e.g., in proximity to a safety related (SR) SSC), spraying will not disperse greater than a distance of 20 ft. In addition, the staff asked that for those low energy systems evaluated at FNP, Units 1 and 2, whether the valid threat systems determined only to be at atmospheric pressure and/or temperature. During the discussion, the staff reiterated these questions. The applicant indicated that it will look into the space approach that other applicants have taken to manage the SSCs located in an area or room. The applicant indicated that it will need to conduct a review on this issue in more detail prior to responding to the staff's questions. This issue will be discussed again during a future conference call or a meeting.

Electrical Target
This issue was discussed during the last telephone conference on February 5, 2004, at which time the staff asked that, for SR mechanical components in low energy locations, whether the mechanical and structural components were qualified to withstand the environmental effects postulated for low energy crack or leakage as part to the current licensing basis (CLB). The staff stated that, if these mechanical and structural components were not qualified for the postulated environment as required by the CLB, then exclusions based on the premise of short-term exposure to wetting of these components does not appear to be reasonable. The staff indicated that these components should be brought into scope, and an appropriate aging management program (AMP) be applied to these system and components (SCs). During the discussion, the staff reiterated these questions. The applicant indicated that it will need to conduct a review on this issue in more detail prior to responding to the staff 's questions. This issue will be discussed again during a future conference call or a meeting.

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

March 2, 2004

Section 3.3: Auxiliary Systems

D-RAI 3.3-6

In numerous systems (including the control room area ventilation system, the auxiliary and radwaste area ventilation system, and the liquid waste and drains system), the applicant credited the One-Time Inspection Program for managing the aging effects of loss of materials, change in material property, and cracking for elastomers components. However, the One-Time Inspection Program is intended for use as a verification AMP to check the degree of aging of components when significant aging is not expected, while periodic inspections are more appropriate if aging effects can reasonably be expected to occur. The degradation of elastomers depends upon the service loads and environmental conditions, including temperature, radiation level, and presence of aggressive chemicals. The applicant is requested to provide additional information on the service loads and environment of the components to justify the use of One-Time Inspection Program for managing the aging effects of elastomers.

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

D-RAI 3.3-7

Galvanized steel components exposed to a moist air environment may experience corrosion. However, for numerous systems, the LRA states that there is no aging effect on galvanized steel ducts and fittings exposed to an inside environment, which is moist and humid air. This conclusion may not be supported by industry experience. The applicant is requested to provide the technical basis for this conclusion considering industry experience.

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

D-RAI 3.3-8

In numerous systems, for example, the auxiliary and radwaste area ventilation system, and the fire protection system, the applicant identified the loss of materials as plausible aging effect on galvanized steel components in the inside environment and credited the Borated Water Leakage Assessment and Evaluation Program (BWLAEP) for managing this aging effect. However, galvanized steel components are not in the scope of the BWLAEP, and it is not clear from the LRA what mitigation or corrective activities will be taken if such corrosion is detected. The applicant is requested to provide information on the effects of boric acid corrosion on the galvanized steel, and how to manage this aging effect. The applicant is also requested to provide operating experience, if any, on boric acid corrosion on the relevant galvanized steel components.

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

D-RAI 3.3-9

In Table 3.0.4-1 (p. 3.0-14) of the LRA, the applicant provided specifics of the inside environment. In particular, it provided the average temperature of 120 degree F and the humidity range of 5-95% within containment. The applicant is requested to clarify whether the conditions specified for the containment environment are expected to be bounding for inside environment for all those buildings listed in the "description" column, and whether those conditions were assumed for the aging of all components in an inside environment. Also, discuss whether conditions exist that render components susceptible to periodic wetting and drying and, if so, address the issue of applicable aging effects in these types of inside environments.

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

D-RAI 3.3-10

The Water Chemistry Control Program is normally augmented by an inspection program to verify the effectiveness of the AMP, especially for stagnant or low-flow areas. For example, the applicant credited Water Chemistry Control Program augmented by One-Time Inspection Program to manage the aging effect for carbon steel components exposed to closed cycle cooling water environment. However, for several auxiliary systems, the Water Chemistry Control Program is credited for managing the loss of material for the stainless steel components exposed to borated water or treated water (including closed cooling water) without being augmented by an inspection program. The applicant is requested to provide justification for the use of the Water Chemistry Control Program without an inspection program to verify its effectiveness for managing the loss of material for stainless steel components.

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

D-RAI 3.3-11

Loss of material due to general, pitting, crevice, microbiologically influenced corrosion and biofouling is a plausible aging effect for stainless steel and carbon steel in the raw water environment or stainless steel exposed to lube oil that may be contaminated with water. In the LRA, the applicant credited the One-Time Inspection AMP for managing the loss of material aging effect on stainless steel and carbon steel piping and valve bodies exposed to raw water environment or stainless steel components exposed to lube oil that may be contaminated with water. However, the staff notes that the One-Time Inspection Program is intended for use as a verification AMP to check the degree of aging of components when significant aging is not expected, while periodic inspections are more appropriate if aging effects can reasonably be expected to occur. The applicant is requested to provide justification for why the One-Time Inspection is appropriate for managing the identified aging effect.

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

D-RAI 3.3-12

In Tables 3.3.2-10 and 3.3.2-11 of the LRA, for copper alloy components exposed to inside environment, the LRA identified loss of material as the aging effect requiring management (AERM) for some components (cooling units), but concluded that there are no aging effects for other components (Pitot tubes). The applicant is requested to justify the different aging management review (AMR) results for the same material and environment combination.

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

D-RAI 3.3-13

The applicant stated that compressed air system (Table 3.3.2-7) and emergency diesel generator system (Table 3.3.2-15) components in a dried gas environment have no applicable aging effects. A dried gas environment is described by the applicant as containing non-condensable vapor with a very limited percentage of moisture present and that dried gases include compressed air (downstream of air dryers), and bottled gases such as carbon dioxide, hydrogen, nitrogen, oxygen and refrigerants. The staff agrees with this position if the gas is relatively dry and moisture-free. However, moisture present in gas may be a major contributor to aging degradation. The applicant is requested to discuss the measures for maintaining and verifying the dryness level in the gas environment, including the acceptance criteria and their basis.

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

D-RAI 3.3-14

For several auxiliary systems such as oil-static cable pressurization system and emergency diesel generator system, the applicant concluded that there are no applicable aging effects for components in lube oil environment. The staff agrees with this position if the lube oil is relatively dry and water-free. However, moisture present in lube oil maybe a major contributor to aging degradation. During operations, moisture may accumulate even though 'fresh' oil maybe relatively dry and water-free initially. The applicant is requested to describe the measures for maintaining and verifying the dryness of the lube oil, including the acceptance criteria and their basis.

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

D-RAI 3.3-15

Several auxiliary systems, such as spent fuel pool cooling and cleanup system, closed-cycle cooling water system, sampling system, and Chemical and Volume Control System (CVCS),

have heat exchangers that are cooled by the closed-cycle cooling water system. It is not clear in the LRA whether inspections and monitoring will be performed on the subcomponents (e.g., tube sheets, tubes, etc.) exposed to closed-cycle cooling water. The applicant is requested to clarify the types of inspections or monitoring that will be performed on the heat exchangers.

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

D-RAI 3.3-16

The LRA does not identify cracking as an applicable AERM for bolting in auxiliary systems. LRA Table 3.3-1, item number 24, states that cracking is not applicable to bolting due to material selection and sound maintenance practices (control of torque, proper lubricants, and sealing compounds); however, the susceptibility to cracking is determined primarily by the bolting material and the operating temperature. In order to justify that cracking is not an applicable AERM, the applicant is requested to provide the reasons by identifying the bolting materials and the yield strength of the bolting procured for the auxiliary systems within the scope of license renewal, and the operating temperatures of the bolting. For high strength bolting (yield strength greater than 150 ksi), provide additional justification for the conclusion that cracking is not an applicable AERM, or provide an appropriate AMP to manage cracking.

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

D-RAI 3.3-17

a. Referring to Table 3.3-1 of the LRA, item 3.3.1-11 states in the discussion that the FNP Structural Monitoring Program (Appendix B.4.3) will manage loss of material of the carbon steel portions of the new fuel storage racks. Discuss applicable non-carbon steel materials (e.g., aluminum, stainless steel, etc.) that are used in FNP's new fuel rack assemblies, their environments, FNP specific aging related operating experience, and the results of their aging management review. Also, explain why these new fuel rack assemblies are not explicitly listed in section B.4.3.5, Program Scope, of the FNP's Structural Monitoring Program.

b. Referring to Table 3.3-1 of the LRA, item 3.3.1-13 states in the discussion that the spent fuel storage racks are not considered susceptible to stress corrosion cracking since the temperature of the borated water in the spent fuel pool is normally less than this threshold temperature for SCC. Elaborate on FNP's use of the phrase: "...normally less than this threshold temperature for SCC," define the threshold temperature referred to therein, explain expected or applicable abnormal conditions implied in the phrase, and discuss applicable SCC related operating experience of FNP spent fuel storage racks and associated valves.

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

3.3.2.1.5 Open-Cycle Cooling Water System

D-RAI 3.3.2.1.5-1

The LRA states the Buried Piping and Tank Inspection Program is used to manage buried carbon steel and buried stainless steel piping in this system. However, the scope of the Buried Piping and Tank Inspection Program only includes buried carbon steel piping and tanks. The applicant is requested to clarify which AMP will be used to manage the buried stainless steel piping. If the Buried Piping and Tank Inspection Program will be used, provide the appropriate updates to the 10 elements or explain how the GALL program will be used for stainless steel components.

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

3.3.2.1.7 Compressed Air System

D-RAI 3.3.2.1.7-1

The LRA credits the One-Time Inspection Program (B.5.5) to manage the aging effect of loss of material of several components in air/gas (wetted) environment. The staff notes that one-time inspections are used for verification when significant aging is not expected. The staff also observes that for comparable components/materials/environments/AERM in the compressed air system, the GALL recommends the use of GALL Program XI.M24, "Compressed Air Monitoring," which uses, in part, periodic inspection/testing of components. The applicant is requested to justify why a one-time inspection is adequate in lieu of periodic inspection/testing of components for the compressed air system components in air/gas (wetted) environment.

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

3.3.2.1.8 Chemical and Volume Control System

D-RAI 3.3.2.1.8-1

The loss of fracture toughness/thermal aging embrittlement may be an applicable aging effect for cast austenitic stainless steel (CASS) components in high temperature borated water environment. The applicant is requested to clarify whether this is an applicable aging effect for the CASS components (such as the regenerative heat exchanger) in the CVCS and, if applicable, provide an aging management program.

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

D-RAI 3.3.2.1.8-2

For stainless steel boric acids tanks in air/gas (air space) environment, the applicant is requested to clarify whether the interior surface of the tank is subjected to periodic drying and wetting due to fluid level changes. If so, clarify whether this may lead to concentrated level of boric acid leading in turn to aging degradation, and provide information on how to manage this aging effect.

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

3.3.2.1.9 Control Room Area Ventilation System

D-RAI 3.3.2.1.9-1

Loss of material due to galvanic corrosion may be a susceptible aging effect on the contact of aluminum fin and copper tubes of the heat exchangers that are exposed to wetted air/gas environment. However, it was not clear in the LRA if galvanic corrosion is included in the One-Time Inspection Program. The applicant is requested to clarify whether the One-Time Inspection Program will manage the galvanic corrosion on the contact area of aluminum fin and copper coils.

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

3.3.2.1.14 Diesel Fuel Oil System

D-RAI 3.3.2.1.14-1

In LRA Table 3.3.2-14 for diesel fuel oil system, the applicant identified loss of material as the aging effect for carbon steel, alloy steel, and stainless steel pipes exposed to inside (protective trench) environment. The LRA does not define the protective trench environment. The applicant is requested to provide a description of this environment and discuss the differences from the regular inside environment (in particular as related to aging mechanisms and aging effects). For managing this aging effect, the LRA identifies the External Surface Monitoring Program for carbon steel and alloy steel piping, whereas it uses One-Time Inspection Program for stainless steel piping. The applicant is requested to provide the basis for using different AMPs.

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

D-RAI 3.3.2.1.14-2

For the carbon steel vent cap and screen in an outside environment, the LRA credits the One-Time Inspection Program for managing the loss of material. The One-Time Inspection Program is intended for components where no significant aging is expected. Since general corrosion is expected to occur in carbon steel in an outside environment, periodic inspection may be more appropriate than a one-time inspection. The applicant is requested to provide additional justification for use of a one-time inspection in lieu of periodic inspection for this component.

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

3.3.2.1.15 Emergency Diesel Generator System

D-RAI 3.3.2.1.15-1

The LRA identifies that copper alloy in a closed cooling water environment is subject to loss of material. For the heat exchanger components (Table 3.3.2-15, p. 3.3-119), the LRA credits the One-Time Inspection Program in conjunction with the Water Chemistry Control Program for aging management. However, for piping (Table 3.3.2-15, p. 3.3-122), the LRA only credits the Water Chemistry Control Program. The applicant is requested to discuss the different aging management of apparently similar material/environment/AERM.

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

D-RAI 3.3.2.1.15-2

In LRA Table 3.3.2-15 for emergency diesel generator system, for most copper alloy or stainless steel components exposed to an air/gas (wetted) environment, the LRA identifies loss of material as the applicable aging effect and credits the One-Time Inspection Program for aging management. However, for ducts and fittings in the intake/exhaust system, and the pipes and valve bodies in the air start system, the LRA also identifies cracking as an applicable aging effect, and credits the One-Time Inspection Program for aging management. The applicant is requested to explain the difference in aging effects for apparently similar material/environment combinations. If the cracking is due to cyclic loading of specific components, justify the use of the One-Time Inspection Program in lieu of periodic inspections, since such cracking may have a long incubation period.

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

3.3.2.1.19 Liquid Waste and Drains

D-RAI 3.3.2.1.19-1

Crack initiation and growth are susceptible aging effect on stainless steel components exposed to borated water environment. However, this is not identified as a plausible aging effect in the LRA, Table 3.3.2-19, for the stainless steel piping and valve bodies. The applicant is requested to provide technical basis for excluding this plausible aging effect.

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

3.3.2.1.21 Potable and Sanitary Water System

D-RAI 3.3.2.1.21-1

Selective leaching is a plausible aging effect for copper alloy components exposed to raw water. However, this aging effect is not identified, in LRA Table 3.3.2-21, for potable and sanitary water system, for the copper alloy piping and valve bodies exposed to raw water. The applicant is requested to provide technical basis for excluding this aging effect.

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

3.3.2.1.23 Reactor Makeup Water Storage System

D-RAI 3.3.2.1.23-1

Crack initiation and growth due to Stress Corrosion Cracking (SCC) may be a plausible aging effect on stainless steel and carbon steel exposed to treated water. However, the LRA does not identify this aging effect on any of the stainless steel or carbon steel components exposed to treated water in the reactor makeup water storage system. The applicant is requested to provide technical basis for excluding this aging effect for the stainless steel or carbon steel components exposed to treated water.

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

3.3.2.1.24 Sampling System

D-RAI 3.3.2.1.24-1

LRA Table 2.3.3.24 states that "exchange heat" is an intended function of the sampling system heat exchanger tubes. The tubes may be subject to buildup or deposit of fouling or other degradation that would result in a loss of heat exchange function; however, this aging effect is not identified in the LRA for the heat exchanger tubes in this system. The applicant is requested to provide the technical basis for excluding this aging effect on the heat exchangers.

Response: 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

March 3, 2004

The NRC staff and representatives of SNC held a telephone conference on March 3, 2004, to follow-up the February 13, 2004, conference call to discuss the applicant's proposed aging management program (AMP) at FNP, Units 1 and 2. The subject AMP was Reactor Vessel Surveillance Program. A summary of the issue discussed and the applicant's proposed action are presented below.

B.3.4, Reactor Vessel Surveillance Program

The staff and the applicant discussed the reactor vessel capsule withdrawal schedule. The staff indicated that the statuary regulatory requirements have been clarified with the Office of General Counsel (OGC), and acknowledged the receipt of the applicant's letter, dated February 23, 2004, for its standby specimen capsule withdrawal plan, submitted under 10 CFR Part 50, Appendix H, requirements. The applicant stated that it plans to submit a detailed report containing the reactor capsule withdrawal history, including how the capsule fluences relate to the reactor vessel fluences, to NRC for review and approval, under 10 CFR Part 50, Appendix H, requirements.

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