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June 18, 2004

Docket No.: 50-348

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555-0001

Joseph M. Farley Nuclear Plant – Unit 1  
Additional Compensatory Actions Related to  
Request for Technical Specification Changes  
DC Sources - Operating

Ladies and Gentlemen:

By letter dated September 19, 2003, Southern Nuclear Operating Company (SNC) submitted a request to amend the Farley Nuclear Plant (FNP) Unit 1 Technical Specifications, Limiting Conditions for Operation (LCO) 3.8.4, "DC Sources – Operating," for Unit 1 for the remainder of operating cycle 19. Cycle 19 is presently scheduled to end on October 2, 2004.

NRC letter dated March 11, 2004 requested SNC to provide additional information related to the proposed TS changes. SNC responded by letter dated March 31, 2004 to this request. NRC question number 6 in the request for additional information asked, "What, if any, compensatory measures are proposed?" SNC responded with two compensatory actions.

On June 7, 2004, the NRC staff requested that SNC consider additional compensatory actions. These actions, along with the previously stated compensatory actions, are listed in the enclosure to this letter. These actions are considered to be regulatory commitments for the remainder of Cycle 19.

As stated in SNC's September 19, 2003 amendment request submittal, FNP's configuration risk management program is governed by procedure FNP-0-ACP-52.1, "Guidelines for Scheduling of On-Line Maintenance," which ensures that on-line risk is appropriately evaluated prior to performing any maintenance activity. This program provides guidance for managing plant trip risk, probabilistic risk, and safety function degradation from on-line maintenance, external or internal conditions, as required by 10 CFR 50.65(a)(4) of the Maintenance Rule. The procedure addresses risk management practices in the maintenance planning and maintenance execution phases for Modes 1 through 3.

(Affirmation and signature provided on the following page).

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If you have any questions, please advise.

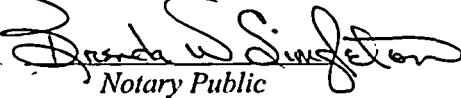
Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



L. M. Stinson

Sworn to and subscribed before me this 18<sup>th</sup> day of June, 2004.

  
Notary Public

My commission expires: 10-9-2005

LMS/WAS/sdl

Enclosure: Compensatory Actions Related to Request for Technical Specification  
Changes, DC Sources – Operating

cc: Southern Nuclear Operating Company  
Mr. J. B. Beasley, Jr., Executive Vice President  
Mr. D. E. Grissette, General Manager – Plant Farley  
RTYPE: CFA04.054; LC# 14063

U. S. Nuclear Regulatory Commission  
Dr. W. D. Travers, Regional Administrator  
Mr. S. E. Peters, NRR Project Manager – Farley  
Mr. C. A. Patterson, Senior Resident Inspector – Farley

Regulatory Commitments Related to  
Request for Technical Specification Changes  
DC Sources - Operating

Regulatory Commitment	Due Date
1) Compensatory measures will be put in place to ensure no maintenance activities are initiated in the high voltage or low voltage switchyards at Farley Nuclear Plant when battery bank 1B is in maintenance.	Upon implementation of the one-time Unit 1 Technical Specification Change related to LCO 3.8.4, "DC Sources – Operating." This commitment will be applicable until the end of operating cycle 19.
2) Grid operators will be notified of the battery maintenance and asked to forego voluntary system operations which could increase the likelihood of LOSP affecting the Farley site.	Whenever Condition A of LCO 3.8.4 is to be entered due to planned maintenance on Auxiliary Building Battery Bank 1B. This commitment will be applicable until the end of operating cycle 19.
3) Battery bank 1B maintenance will not be initiated if inclement weather is present or forecast for the planned duration of the maintenance. Inclement weather includes, but is not limited to, severe thunderstorms, hail, and tornados. Should inclement weather develop while battery bank 1B is undergoing maintenance, SNC will restore battery bank 1B to operability as soon as practicable.	Whenever Condition A of LCO 3.8.4 is to be entered due to planned maintenance on Auxiliary Building Battery Bank 1B. This commitment will be applicable until the end of operating cycle 19.
4) The grid operator will be contacted prior to initiating maintenance to ascertain the status of the grid. Battery bank 1B maintenance shall not be initiated if electrical grid is degraded. Should electrical grid become degraded while battery bank 1B is undergoing maintenance, SNC will restore battery bank 1B to operability as soon as practicable.	Whenever Condition A of LCO 3.8.4 is to be entered due to planned maintenance on Auxiliary Building Battery Bank 1B. This commitment will be applicable until the end of operating cycle 19.