



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 8, 2004

MEMORANDUM TO: P.T. Kuo, Program Director
License Renewal and Environmental Impacts
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation
/RA/

FROM: Dale F. Thatcher, Section Chief
Plant Support Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

SUBJECT: AUDIT TRIP REPORT REGARDING THE SOUTHERN COMPANY
LICENSE RENEWAL APPLICATION FOR THE FARLEY NUCLEAR
POWER STATIONS, DATED SEPTEMBER 12, 2003

Plant Name: Joseph M. Farley Nuclear Plant, Units 1 and 2
Utility Name: Southern Nuclear Operating Co.
Docket No.(s): 50-348 (NPF-2)
50-364 (NPF-8)
TAC No.(s): MC0774
MC0775
Review Branch: IPSB
Review Status: Pending resolution of identified issues

From November 17-21, 2003, the Emergency Preparedness and Plant Support Branch (IEPB) performed an audit of the Southern Nuclear Operating Co. (the applicant) license renewal scoping and screening methodology developed to support the Joseph M. Farley Nuclear Plant license renewal application (LRA) dated September 12, 2003. The focus of the staff's audit was evaluation of the applicant's administrative controls governing implementation of the LRA scoping and screening methodology and review of the technical basis for selected scoping and screening results for various plant systems, structures, and components. The audit team also reviewed quality attributes for aging management programs. A trip report containing a summary of the audit results is attached.

Should you require additional information, please contact Greg Galletti, of my staff, at 415-1831.

Attachment: As stated

CONTACT: Greg Galletti, IPSB/DIPM/NRR
301-415-1831

MEMORANDUM TO: P.T. Kuo, Program Director
 License Renewal and Environmental Impacts
 Division of Regulatory Improvement Programs
 Office of Nuclear Reactor Regulation

September 8, 2004

/RA/

FROM: Dale F. Thatcher, Section Chief
 Plant Support Branch
 Division of Inspection Program Management
 Office of Nuclear Reactor Regulation

SUBJECT: AUDIT TRIP REPORT REGARDING THE SOUTHERN COMPANY
 LICENSE RENEWAL APPLICATION FOR THE FARLEY NUCLEAR
 POWER STATIONS, DATED SEPTEMBER 12, 2003

Plant Name: Joseph M. Farley Nuclear Plant, Units 1 and 2
 Utility Name: Southern Nuclear Operating Co.
 Docket No.(s): 50-348 (NPF-2)
 50-364 (NPF-8)
 TAC No.(s): MC0774
 MC0775
 Review Branch: IPSB
 Review Status: Pending resolution of identified issues

From November 17-21, 2003, the Emergency Preparedness and Plant Support Branch (IEPB) performed an audit of the Southern Nuclear Operating Co. (the applicant) license renewal scoping and screening methodology developed to support the Joseph M. Farley Nuclear Plant license renewal application (LRA) dated September 12, 2003. The focus of the staff's audit was evaluation of the applicant's administrative controls governing implementation of the LRA scoping and screening methodology and review of the technical basis for selected scoping and screening results for various plant systems, structures, and components. The audit team also reviewed quality attributes for aging management programs. A trip report containing a summary of the audit results is attached.

Should you require additional information, please contact Greg Galletti, of my staff, at 415-1831.

Attachment: As stated

CONTACT: Greg Galletti, IPSB/DIPM/NRR
 301-415-1831

DISTRIBUTION:

IEPB R/F BBoger TFrye TLiu,PM
 CJulian,RII RPettis KNaidu

ADAMS: ML042520177

DOCUMENT NAME:C:\ORPCheckout\FileNET\ML042520177.wpd

To receive a copy of this document, indicate in the box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

OFFICE	IPSB/DIPM	IPSB/DIPM					
NAME	GGalletti	DThatcher					
DATE	09/08/04	09/08/04					

OFFICIAL RECORD COPY

**Trip Report Regarding the
Southern Nuclear Operating Company
License Renewal Application (LRA) for the
Joseph M. Farley Nuclear Plant, Units 1 and 2, dated September 12, 2003**

I. Introduction

From November 17 - 21, 2003, Greg Galletti, Kamalakar Naidu, Wayne Scott, and Robert Pettis of the Emergency Preparedness and Plant Support Branch, and Tilda Liu, License Renewal Projects staff, audited the Southern Nuclear Operating Company (the applicant) license renewal scoping and screening methodology developed to support the Joseph M. Farley Nuclear Plant, Units 1 and 2 (Farley) license renewal application (LRA). The audit was performed at the applicant's corporate offices in Birmingham, Alabama. The focus of the staff's audit was evaluation of the applicant's administrative controls governing implementation of the LRA scoping and screening methodology and review of the technical basis for selected scoping and screening results for various plant systems, structures, and components. The audit team also reviewed quality attributes for aging management programs.

II. Background

Title 10 of the *Code of Federal Regulations*, Part 54 (10 CFR Part 54), "Requirements for Renewal of Operating Licenses for Nuclear Power Plants," Section 54.21, "Contents of Application — Technical Information," requires that each application for license renewal contain an integrated plant assessment (IPA). Furthermore, the IPA must list and identify those structures and components (SCs) that are subject to an aging management review (AMR) from the systems, structures, and components (SSCs) that are within the scope of license renewal. 10 CFR 54.4(a) identifies the plant systems, structures, and components (SSCs) within the scope of license renewal. Structures and components (SCs) within the scope of license renewal are screened to determine if they are long-lived, passive equipment that is subject to an aging management review in accordance with 10 CFR 54.21(a)(1).

III. Scoping Methodology

The scoping evaluations for the Farley LRA were performed by the applicant's license renewal project personnel. The audit team conducted detailed discussions with the applicant's license renewal project management personnel and reviewed documentation pertinent to the scoping process. The audit team assessed if the scoping methodology outlined in the LRA and implementation procedures was appropriately implemented and if the scoping results were consistent with current licensing basis requirements. The audit team also reviewed a sample of system scoping results for the following systems: Residual Heat Removal/Low head Safety Injection, Auxiliary Feedwater, Main Steam, and Open Cycle Cooling Water Systems. In general, the team determined that the applicant's overall approach to license renewal SSC scoping appeared to be adequate. However, the audit team identified several issues where additional information will be required to complete the LRA review. These issues are documented in a draft request for additional information and are briefly described below:

The audit team identified several questions associated with the applicant's methodology for performing license renewal scoping of nonsafety-related SSCs pursuant to the requirements of 10 CFR 54.4(a)(2). Specific questions involved: (1) the basis for use of proceduralized criteria that could exclude certain nonsafety-related equipment from the scope of license renewal (e.g. low pressure nonsafety-related equipment could be excluded from scope if it was more than 20 feet from a safety-related SSC); (2) the basis for the valid safety-related target set to only include electrical SSCs; (3) The basis for establishing the equivalent seismic anchor, or physical restraint in the third direction; (4) clarification that the nonsafety-related equipment credited with providing anchorage for nonsafety-related piping that was attached to safety-related piping is included within scope; and (5) the use of operating experience for determining that certain gas-filled SSC failures were not credible.

In addition, the audit team identified a portion of nonsafety-related piping in the service water system which met the applicant's criteria established for nonsafety-related piping attached to safety-related piping and which provides support for the safety-related piping, that was initially not within the scope of license renewal. The audit team requested the applicant review the circumstances to determine why the portion of piping had not been included in scope and to perform an evaluation of the extent of condition as a result.

The staff will complete the evaluation of the applicant's scoping methodology pending resolution of these issues.

IV. Screening Methodology

The audit team reviewed the methodology used by the applicant to determine if mechanical, structural, and electrical components within the scope of license renewal would be subject to further aging management review. The applicant provided the staff with a detailed discussion of the processes used for each discipline and provided administrative documentation that described the screening methodology. The audit team also reviewed a sample of the screening results reports for a selected group of safety-related and nonsafety-related systems. The team noted that the applicants screening process was performed in accordance with their written requirements and was consistent with the guidance provided in the staff's LR-SRP and the NEI 95-10, Revision 3 document. The audit team determined that the screening methodology was consistent with the requirements of the Rule, and that the screening methodology will identify SCs that meet the screening criteria of 10 CFR 54.21(a)(1).

V. Aging Management Program Quality Assurance Attributes

The audit team evaluated the quality attributes of the applicant's Aging Management Program (AMP) activities described in Appendix A, "FSAR Supplement," and Appendix B, "Aging Management Activities," of the LRA using the guidance contained in NUREG-1800, Section A.2, "Quality Assurance for Aging Management Programs (Branch Technical Position IQMB-1)." Based on the staff's evaluation, the quality attributes (corrective action, confirmation process, and administrative controls) described in Appendix B, Section B1.3, "Quality Assurance Program and Administrative Controls," of the LRA for all programs credited for managing aging effects were consistent with Branch Technical Position IQMB-1. However, the team determined

that the applicant has not sufficiently described the AMP quality attributes in the Appendix A, "FSAR Supplement." A request for additional information has been initiated in order to complete the review of quality assurance attributes associated with the AMPs credited for managing aging effects described in LRA Appendix A.

VI. Exit Meeting

A public exit meeting was held with the applicant on November 21, 2003, to discuss the results of the scoping and screening methodology audit. The audit team identified preliminary areas where additional information would be required to support completion of the staff's LRA review. Draft requests for additional information related to the applicant's scoping and screening methodology were forwarded to the NRR License Renewal and Environmental Impacts Program Director on December 09, 2003 (ADAMS Accession No. ML033430149).