

L. M. Stinson (Mike)  
Vice President

Southern Nuclear  
Operating Company, Inc.  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201

Tel 205.992.5181  
Fax 205.992.0341

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NL-05-0397

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

Joseph M. Farley Nuclear Plant Units 1 and 2  
Application for License Renewal – Revision to RAI 3.3.2.1.5-1

Ladies and Gentlemen:

By letter dated September 12, 2003, Southern Nuclear Operating Company (SNC) submitted an application for the renewal of the operating licenses of Joseph M. Farley Nuclear Plant, Units 1 and 2 (FNP).

As discussed in a conference call on March 1, 2005, SNC is revising the Buried Piping and Tank Inspection Program described in letter NL-04-0473, dated April 7, 2004, RAI 3.3.2.1.5-1 response, as shown in the enclosure to this letter.

Mr. L. M. Stinson states he is a vice president of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and to the best of his knowledge and belief, the facts set forth in this letter are true.

If you have any questions, please contact Charles Pierce at 205-992-7872.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

L. M. Stinson  
Vice President, Farley

Sworn to and subscribed before me this 3<sup>rd</sup> day of March, 2005.

Notary Public

My commission expires: 6-7-05

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LMS/JAM/slb

cc: Southern Nuclear Operating Company  
Mr. J. T. Gasser, Executive Vice President  
Mr. J. R. Johnson, General Manager – Plant Farley  
Document Services RTYPE: CFA04.054; LC# 14229

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

Alabama Department of Public Health  
Dr. D. E. Williamson, State Health Officer

**ENCLOSURE**

**Joseph M. Farley Nuclear Plant Units 1 and 2**

**Application for License Renewal**

**Buried Piping and Tanks Program – Revised Response to RAI 3.3.2.1.5-1**

The response to RAI 3.3.2.1.5-1, submitted by letter NL-04-0473 dated April 7, 2004, is revised as follows (revisions shown in bold italics).

#### B.5.4.3 Exceptions to NUREG-1801

- Buried stainless steel and copper alloy piping components are also included in the scope of the program. The buried stainless steel and copper alloy components are not normally wrapped or coated, however, these materials have a natural resistance to corrosion in the buried environment.
- Inspections are performed when the components are excavated for maintenance or for any other reason including investigation of a potential leak.
- For uncoated/unwrapped piping, visual inspection will also be used to examine the external surfaces to confirm that ***no loss of material*** has occurred.
- ***Loss of material*** in piping will be reported and evaluated according to site corrective actions procedures.

#### B.5.4.5 Operating Experience

This is a new program. Therefore, no programmatic operating experience has been gained. Leaks in buried piping systems at FNP have typically resulted from localized damage to the external coating/wrapping on carbon steel piping, such as from a rock or mechanical damage during installation. FNP has been successful at detecting these leaks prior to any loss of system function. ***FNP has had no age-related failures of buried uncoated, unwrapped piping in its operating experience.***