

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



June 9, 2005

Docket Nos.: 50-348
50-364

NL-05-0937

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

Joseph M. Farley Nuclear Plant - Units 1 and 2
Requests for Exemption/Amendment from Fire Protection Requirements at
Farley Nuclear Plant

Ladies and Gentlemen:

In letters dated January 19, 2005, Southern Nuclear Operating Company (SNC) requested an exemption for Joseph M. Farley Nuclear Plant (FNP) Unit 1 from 10 CFR Appendix R Section III.G.2 and an amendment for FNP Unit 2 to use fire rated electrical cable which has been demonstrated to provide an equivalent level of protection as would be provided by a one hour rated electrical cable raceway fire barrier enclosure as described by 10 CFR 50, Appendix R, Section III.G.2 for protection of safe shutdown control circuits located in FNP fire areas 1-013, 1-042, 2-013, and 2-042.

During telecoms with the NRC and with Meggitt Safety Systems Inc., the proprietary nature of the Meggitt Safety Systems Inc. Test Report was discussed. Subsequently, it has been determined that the test report could be designated as non-proprietary.

The purpose of this letter is to replace the proprietary-marked Meggitt Safety Systems Inc. Test Report (Document ER 04-040 Revision B), which was included as part of the two January 19, 2005 SNC requests, with a non-proprietary version (Document ER 04-040 Revision C) of same report. The reports are identical except that the report included with this letter is non-proprietary. The affidavit regarding proprietary information, submitted in the January 19, 2005 letters, is no longer needed and the affidavit is withdrawn.

As stated in the January 19, 2005 letters, SNC requests NRC approval of the Unit 1 exemption and the Unit 2 amendment by January 21, 2006.

(Affirmation and signature provided on the following page)

A006

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.

This letter contains no NRC commitments. If you have any questions, please advise.

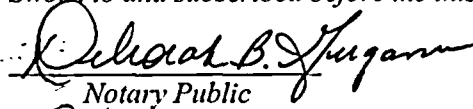
Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



L. M. Stinson

Sworn to and subscribed before me this 9 day of June, 2005.


Notary Public

My commission expires: _____

NOTARY PUBLIC STATE OF ALABAMA AT LARGE
MY COMMISSION EXPIRES: June 10, 2008
BONDED THRU NOTARY PUBLIC UNDERWRITERS

LMS/jls/sdl

Enclosure: Meggitt Safety Systems, Inc. Fire Test Report ER 04-040, Revision C

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President
Mr. J. R. Johnson, General Manager – Plant Farley
RTYPE: CFA04.054; LC# 14278

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

**Joseph M. Farley Nuclear Plant - Units 1 and 2
Request for Exemption/Amendment from Fire Protection Requirements at
Farley Nuclear Plant**

Enclosure

Meggitt Safety Systems, Inc. Fire Test Report ER 04-040, Revision C



**MEGGITT SAFETY
SYSTEMS INC**

ENGINEERING DEPARTMENT

DOCUMENT

ER 04-040

TITLE

**APPENDIX R, ONE-HOUR FIRE RESISTIVE, MINERAL INSULATED
CONTROL CABLE FIRE TEST REPORT
FOR
SOUTHERN NUCLEAR OPERATING COMPANY, INC.**

APPROVALS			CONTROLLED DISTRIBUTION						
PREPARED: A. Luterstein 7/30/04	ENG: Vahid Badii 7/30/04	Q.A.: G.Griffis 7/30/04	SIZE A	CAGE CODE: 25693	ER 04-040				
MFG: N/A	CHECKED Ark Nemirov 7/30/04			REV. C	SHEET 1 of 4				

REV.	DATE	DESCRIPTION	APPROVALS	
A	040730	INITIAL RELEASE	AL	VB
B	040813	Revised per ECO 04-887	AL	VB
C	<u>050122</u>	Revised per ECO 05-363	<u>AL</u>	<u>VB</u>

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SIZE A	CAGE CODE 25693	ER 04-040
	REV C	SHEET 2 OF 4

1.0 OBJECTIVE

The objective of this program is to validate the fire performance of Meggitt Safety Systems Inc. (MSSI) silicone dioxide insulated 8 conductor #12 AWG cable with factory splice and cable support for use in nuclear power facilities.

The MSSI cable P/N 300283-5 was subjected to a one-hour ASTM E-119 fire exposure followed by a hose stream test in accordance with US NRC Generic Letter 86-10 Supplement 1. The cable insulation resistance and cable conductor resistance were monitored during the test.

2.0 TEST RESULTS

The test results presented in Appendix A demonstrate that cable and support performances meet the acceptance criteria specified in the Appendix R One-hour Fire test Plan, ER 04-029 (AREVA Document No. 51-5045887-01).

The Omega Point Laboratories Test Report (Project No. 14980-119368, Revision 1) attached in Appendix A includes Revision A of the document ER 04-033 in Appendix D" Quality Assurance".

The document ER 04-033, Revision C, " Unpacking, Inspection, Installation and Standard Practices for 8/C #12 AWG Si 2400 Fire Rated Cable for J.M. Farley Nuclear Power Plant", is the version approved for installation of the MI cables for Southern Nuclear Operating Company project. The test specimen installed configuration for the fire test conformed to the details in ER 04-033, Revision C.

3.0 CONCLUSION

The MSSI 8 conductor #12 AWG Appendix R control cable is certified to be implemented by design change packages (DCPS 03-1-9901, 03-1-9902, and 03-2-9906) at Farley Nuclear Plant (FNP).

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APPENDIX A

**Appendix R, One-Our Fire Resistive Control Cable Test Report
(132 pages)**



"119368 Rev1
Report.pdf"

SIZE A	CAGE CODE 25693	ER 04-040
	REV C	SHEET 4 OF 4