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November 17, 2006

Docket Nos.: 50-348
50-364

NL-06-2604

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

Joseph M. Farley Nuclear Plant, Units 1 & 2
Third 10-Year Interval Inservice Inspection Program
Submittal of Revised Request for Relief RR-12

Ladies and Gentlemen:

At the beginning of the 3rd 10-Year ISI Interval for Joseph M. Farley Nuclear Plant (FNP) Units 1 and 2, Request for Relief RR-12 was submitted for each unit and subsequently approved by the NRC in a letter dated January 12, 1999 (TAC NOS. M98858 and M98859). Request for Relief RR-12 proposed snubber examinations and testing in accordance with the plant's Technical Specifications in lieu of ASME Section XI Code, 1989 Edition, Article IWF-5000.

Southern Nuclear Operating Company (SNC) implemented Improved Technical Specifications by Amendments 146 and 137, issued November 30, 1999, which resulted in moving the snubber requirements to the Technical Requirements Manual (TRM). During this transfer to the TRM the snubber Technical Specification section was moved without alteration.

SNC recently re-evaluated the requirements for snubber examination and testing and determined that FNP differs from other domestic plants in the initial snubber functional test sample size. FNP has been utilizing a plan which requires an initial sample size of 88 snubbers, whereas other plants use a 10% sample size. With the plant snubber population having been significantly reduced over the past several years, adoption of the 10% plan and associated expansion process would be of benefit to FNP and changes to the TRM are therefore warranted. Revisions to Request for Relief RR-12 for each unit are proposed accordingly and are hereby submitted for NRC approval.

Please note that Request for Relief RR-12 for each unit is only applicable for the remainder of the 3rd 10-Year ISI Interval, which ends November 30, 2007. At that time, SNC will be updating the FNP ISI Programs to meet the applicable requirements of 10 CFR 50.55a(g)(4).

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To support the upcoming Spring 2007 outage, SNC request the approval of RR-12 by March 1, 2007.

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

Sincerely,



H. L. Sumner, Jr.

HLS/BDM/daj

Enclosures: 1. Farley Unit 1 Revised Request for Relief RR-12
2. Farley Unit 2 Revised Request for Relief RR-12

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President
Mr. J. R. Johnson, General Manager – Plant Farley
RTYPE: CFA04.054; LC# 14510

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

Enclosure 1

**Farley Unit 1
Revised Request for Relief RR-12**

SOUTHERN NUCLEAR OPERATING COMPANY
FARLEY UNIT 1
THIRD 10-YEAR INTERVAL
REVISED REQUEST FOR RELIEF NO. RR-12

- I. System/Component(s) for Which Relief is Requested: Examination and testing of hydraulic and mechanical snubbers per Article IWF-5000 of the 1989 Edition of ASME Section XI.
- II. Code Requirement: Article IWF-5000 of the 1989 Edition of ASME Section XI provides the requirements for inservice inspection of snubbers. The details for the performance of inservice examinations and tests per the 1989 Edition of ASME Section XI are provided in the first addenda to ASME/ANSI OM-1987, Part 4.
- III. Code Requirement for Which Relief is Requested: Relief is requested from the requirements of IWF-5000. As an alternative, it is proposed that the required inservice examination and testing of snubbers be performed in accordance with the revised FNP Technical Requirements Manual (TRM) Section TR 13.7.2. for the remainder of the 3rd 10-Year ISI Interval.
- IV. Basis for Relief: Snubber examinations and functional testing have been performed in accordance with either the Technical Specifications or the TRM since the initial preservice period. The snubber examination and functional testing requirements were relocated from the Technical Specifications (TS) to the TRM without alteration by Amendment 146 as part of the conversion to the Improved Technical Specifications (ITS). Codified requirements for snubbers did not exist until 1990 with issue of the ASME OM Code, 1990 Edition, Subsection ISTD. SNC has been significantly involved with the ASME OM Code, ISTD Subgroup, and the industry Snubber Users Group (SNUG) since their inception. A survey of other domestic nuclear power plants indicates that currently no other plants are utilizing the OM Code Subsection ISTD for snubber examinations and testing. All other plants instead utilize either their TS or TRM. SNC believes that it would be prudent to continue to follow this industry practice rather than be an outlier by adoption of the OM Code at this time.

TRM Section TR 13.7.2 has been revised to incorporate the current industry standard 10% snubber sample for functional testing each refueling outage. This revision includes provisions for sample expansion due to functional test failures which also parallel the industry standard practice. The previous version of the TRM committed FNP-1 to a plant specific snubber functional test program due to the large number of snubbers installed on safety related systems and snubber reliability issues early in plant life. Over the past several years, FNP-1 has initiated a snubber reduction program combined with greatly improved periodic maintenance, routine snubber replacement and improvements in snubber design and reliability. Therefore, the initial functional test sample of 88 snubbers greatly exceeded the standard industry accepted sample size and is no longer warranted based on FNP-1 and industry snubber experience.

- V. Alternate Examination: Inservice examination and testing of snubbers will be performed in accordance with FNP TRM Section TR 13.7.2, revised as described below.
 1. The snubber functional test sample size is 10% of each snubber group during each refueling outage.

SOUTHERN NUCLEAR OPERATING COMPANY
FARLEY UNIT 1
THIRD 10-YEAR INTERVAL
REVISED REQUEST FOR RELIEF NO. RR-12

2. For each snubber of a type that does not meet the functional test acceptance criteria, an additional 5% of that type snubber shall be functionally tested until no more failures occur or until all snubbers of that type have been tested.

VI. Justification for Granting Relief: The previous FNP TRM snubber examination and testing program effectively demonstrated the operational readiness of snubbers. The previous TRM program consisted of visual examination of 100% of the snubber population each refueling outage and testing of a representative sample of 88 snubbers. In recognition of the significant reduction in the snubber population, improved maintenance practices and snubber design and reliability improvements at FNP, the revised TRM program follows common industry practice and tests a minimum 10% sample of each category of snubbers each refueling outage, with provisions for scope expansion if any snubbers fail the as-found functional test. The TRM also requires a visual examination of 100% of the snubbers in the program scope each refueling outage which is consistent with current industry practice.

Use of the revised TRM requirements will continue to provide a demonstrated level of snubber operational readiness, quality and safety, thereby ensuring that public health and safety will not be endangered by approval of this relief request. Accordingly, SNC requests that relief be authorized pursuant to 10 CFR 50.55a(a)(3)(i).

- VII. Implementation Schedule: This request for relief is applicable to the ISI examinations performed from December 1, 2006 to November 30, 2007 (remainder of 3rd 10-Year ISI Interval).
- VIII. Relief Request Status: This relief request has been revised to indicate the functional test sample size in the TRM and has been resubmitted for NRC review.

Enclosure 2

**Farley Unit 2
Revised Request for Relief RR-12**

SOUTHERN NUCLEAR OPERATING COMPANY
FARLEY UNIT 2
THIRD 10-YEAR INTERVAL
REVISED REQUEST FOR RELIEF NO. RR-12

- I. System/Component(s) for Which Relief is Requested: Examination and testing of hydraulic and mechanical snubbers per Article IWF-5000 of the 1989 Edition of ASME Section XI.
- II. Code Requirement: Article IWF-5000 of the 1989 Edition of ASME Section XI provides the requirements for inservice inspection of snubbers. The details for the performance of inservice examinations and tests per the 1989 Edition of ASME Section XI are provided in the first addenda to ASME/ANSI OM-1987, Part 4.
- III. Code Requirement for Which Relief is Requested: Relief is requested from the requirements of IWF-5000. As an alternative, it is proposed that the required inservice examination and testing of snubbers be performed in accordance with the revised FNP Technical Requirements Manual (TRM) Section TR 13.7.2. for the remainder of the 3rd 10-Year ISI Interval.
- IV. Basis for Relief: Snubber examinations and functional testing have been performed in accordance with either the Technical Specifications or the TRM since the initial preservice period. The snubber examination and functional testing requirements were relocated from the Technical Specifications (TS) to the TRM without alteration by Amendment 137 as part of the conversion to the Improved Technical Specifications (ITS). Codified requirements for snubbers did not exist until 1990 with issue of the ASME OM Code, 1990 Edition, Subsection ISTD. SNC has been significantly involved with the ASME OM Code, ISTD Subgroup, and the industry Snubber Users Group (SNUG) since their inception. A survey of other domestic nuclear power plants indicates that currently no other plants are utilizing the OM Code Subsection ISTD for snubber examinations and testing. All other plants instead utilize either their TS or TRM. SNC believes that it would be prudent to continue to follow this industry practice rather than be an outlier by adoption of the OM Code at this time.

TRM Section TR 13.7.2 has been revised to incorporate the current industry standard 10% snubber sample for functional testing each refueling outage. This revision includes provisions for sample expansion due to functional test failures which also parallel the industry standard practice. The previous version of the TRM committed FNP-2 to a plant specific snubber functional test program due to the large number of snubbers installed on safety related systems and snubber reliability issues early in plant life. Over the past several years, FNP-2 has initiated a snubber reduction program combined with greatly improved periodic maintenance, routine snubber replacement and improvements in snubber design and reliability. Therefore, the initial functional test sample of 88 snubbers greatly exceeded the standard industry accepted sample size and is no longer warranted based on FNP-2 and industry snubber experience.

- V. Alternate Examination: Inservice examination and testing of snubbers will be performed in accordance with FNP TRM Section TR 13.7.2, revised as described below.
 1. The snubber functional test sample size is 10% of each snubber group during each refueling outage.

SOUTHERN NUCLEAR OPERATING COMPANY
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THIRD 10-YEAR INTERVAL
REVISED REQUEST FOR RELIEF NO. RR-12

2. For each snubber of a type that does not meet the functional test acceptance criteria, an additional 5% of that type snubber shall be functionally tested until no more failures occur or until all snubbers of that type have been tested.

VI. Justification for Granting Relief: The previous FNP TRM snubber examination and testing program effectively demonstrated the operational readiness of snubbers. The previous TRM program consisted of visual examination of 100% of the snubber population each refueling outage and testing of a representative sample of 88 snubbers. In recognition of the significant reduction in the snubber population, improved maintenance practices and snubber design and reliability improvements at FNP, the revised TRM program follows common industry practice and tests a minimum 10% sample of each category of snubbers each refueling outage, with provisions for scope expansion if any snubbers fail the as-found functional test. The TRM also requires a visual examination of 100% of the snubbers in the program scope each refueling outage which is consistent with current industry practice.

Use of the revised TRM requirements will continue to provide a demonstrated level of snubber operational readiness, quality and safety, thereby ensuring that public health and safety will not be endangered by approval of this relief request. Accordingly, SNC requests that relief be authorized pursuant to 10 CFR 50.55a(a)(3)(i).

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