

**Southern Nuclear
Operating Company, Inc.**
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October 8, 2007

Docket Nos.: 50-348
50-364

NL-07-1613

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

Joseph M. Farley Nuclear Plant – Units 1 & 2
FNP-ISI-ALT-02, Version 1.0, Proposed Alternative in Accordance With
10 CFR 50.55a(a)(3)(ii)

Ladies and Gentlemen:

Pursuant to 10 CFR 50.55a, Southern Nuclear Operating Company (SNC) hereby requests NRC approval of proposed Alternative FNP-ISI-ALT-02, which proposes that each weld and area undergoing a surface or volumetric examination will receive the Code required reference markings and identification, as the examinations are being performed, in lieu of marking all of the welds and areas as required by the Code. The proposed alternative is applicable for the 4th Inservice Inspection Interval.

The details of the 10 CFR 50.55a request are contained in the enclosure. Approval is requested by September 14, 2008, to support 4th interval examinations to be performed during the Fall 2008 Outage at FNP-2.

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

Sincerely,

A handwritten signature in black ink, appearing to read "B. J. George", written over a horizontal line.

B. J. George
Manager, Nuclear Licensing

BJG/JLS/pr

Enclosure: FNP-ISI-ALT-02, Version 1.0, Proposed Alternative in Accordance
With 10 CFR 50.55a(a)(3)(ii)

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President
Mr. J. R. Johnson, Vice President – Plant Farley
Mr. D. H. Jones, Vice President – Engineering
RType: CFA04.054; LC# 14632

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

Joseph M. Farley Nuclear Plant – Units 1 & 2

Enclosure

**FNP-ISI-ALT-02, Version 1.0, Proposed Alternative in Accordance With
10 CFR 50.55a(a)(3)(ii)**

**FNP-ISI-ALT-02, Version 1.0, Proposed Alternative in Accordance With
10 CFR 50.55a(a)(3)(ii)**

Plant Site - Unit: Farley Nuclear Plant (FNP) - Units 1 and 2.

**Interval-
Interval Dates:** 4th ISI Interval extending from December 1, 2007, through November 30, 2017. (Reference: Alternative FNP-ISI-ALT-01)

**Requested Date
for Approval:** Approval is requested by September 14, 2008, to support 4th interval examinations to be performed during the Fall 2008 Outage at FNP-2.

**ASME Code
Components
Affected:** All welds and areas that are subject to surface or volumetric examination.

**Applicable
Code Edition
and Addenda:** ASME Section XI, 2001 Edition through the 2003 Addenda.

**Applicable Code
Requirements:** IWA-2610 requires that a reference system be established for all welds and areas subject to surface or volumetric examination. The system shall permit identification of each weld, location of each weld centerline, and designation of regular intervals along the length of the weld.

**Reason for
Request:** This alternative is a submittal comparable to the NRC approved 3rd interval relief request RR-11. RR-11 was based on the 1989 Edition of Section XI (no addenda) while this 4th interval request is based on the 2001 Edition through the 2003 Addenda; however, there have been no substantive changes to the Code requirements or to the Basis for Use which would alter the previous NRC Safety Evaluation conclusions.

See References for dates and TAC numbers associated with RR-11.

**FNP-ISI-ALT-02, Version 1.0, Proposed Alternative in Accordance With
10 CFR 50.55a(a)(3)(ii)**

**Proposed
Alternative and
Basis for Use:**

It is proposed that, in lieu of marking all of the welds and areas as required by the Code, each weld and area undergoing a surface or volumetric examination will receive the Code required reference markings and identification as the examinations are being performed.

For an operating plant, establishing a weld reference system for all welds and areas subject to surface or volumetric examination is a major effort and, in some cases, is prohibitive due to inaccessibility and/or high radiation areas. To establish a comprehensive weld reference system for all of the welds and areas subject to volumetric or surface examinations in accordance with the Code requirements would require many man-hours of work and many man-rem of exposure to locate the welds, remove the insulation, mark the welds, and re-install the insulation. Since only a small percentage of welds are normally examined, the majority of the welds that would be marked per the Code requirement would never receive an inservice examination. To require the marking all of the welds and areas subject to surface or volumetric examination in an operating plant environment, even though most will not require examination, would result in a hardship without a compensating increase in quality and safety.

Marking the welds and areas that are receiving an examination will provide assurance, that when performing subsequent examinations, the correct weld is being re-examined and the recorded indications can be correlated with previous data. Not marking the welds and areas which are not receiving examinations will have little, if any, affect on safety and quality at Plant Farley; therefore, approval of this request per 10 CFR 50.55a(a)(3)(ii) should be granted.

**Duration of
Proposed
Alternative:**

The proposed alternative is applicable for the 4th Inservice Inspection Interval.

Precedents:

This request was approved for the 3rd Inservice Inspection Interval as RR-11.

References:

SNC letter dated May 28, 1997, submitting RR-11.

RR-11 was approved for 3rd Interval by NRC TAC number M98858 and M98859 dated January 12, 1999.

Status:

Awaiting NRC approval.