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50-364

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

Joseph M. Farley Units 1 and 2
Letter of Intent to Adopt the 2001 Edition of NFPA 805 "Performance-Based
Standard for Fire Protection for Light Water Reactor Electric Generating Plants"

Ladies and Gentlemen:

This letter serves to inform the NRC of Southern Nuclear Operating Company's (SNC) intent to adopt the 2001 edition of National Fire Protection Association (NFPA) Standard 805, "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants" in accordance with 10 CFR 50.48(c) for Farley Nuclear Plant Units 1 and 2.

The transition to the performance-based standard for fire protection will commence in February 2008 and it is expected to take approximately thirty-six months to develop the license amendment request.

SNC requests enforcement discretion for thirty-six months, allowable as indicated in the April 18, 2006 Federal Register Notice (71 FR 19905). The Federal Register Notice described the NRC Interim Enforcement Discretion policy regarding enforcement discretion for certain noncompliances related to fire protection programs and the transition to 10 CFR 50.48(c). As outlined in the Enforcement Policy, enforcement discretion will be in effect beginning from the date of the licensee's letter of intent. The Enforcement Policy also provides for extension of the discretion period if adequate justification is provided.

The Farley Nuclear Plant NFPA 805 transition process consists of three phases:

Phase 1 – Preliminary Assessment of the Fire Protection Program

- Technical and regulatory assessments performed to determine the feasibility and practicality of performing the transition. This phase is now complete.

Phase 2 – Reviews and Engineering Analysis

- Completion of the Fire Protection Probabilistic Risk Assessment (PRA)
- Fundamental Fire Protection Program and Design Elements Review
- Nuclear Safety Performance Criteria Transition Review
- Non-Power Operational Mode Transition Review
- Radiological Release Transition Review
- Change Evaluations
- License Amendment Request

Phase 3 – Implementation

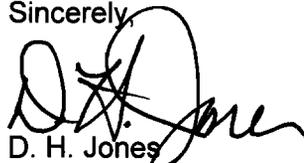
- Program Documentation
- Configuration Control
- Monitoring

The process will be considered complete upon receipt of the License Amendment authorizing the transition to NFPA 805.

Because the transition to the NFPA 805 performance-based standard is a voluntary initiative, this correspondence contains no regulatory commitments.

If you have any questions, please advise.

Sincerely,



D. H. Jones
Vice President - Engineering

DHJ/JLS/phr

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President
Mr. J. R. Johnson, Vice President – Farley
Mr. D. H. Jones, Vice President – Engineering
RTYPE: CFA04.054; LC# 14718

U. S. Nuclear Regulatory Commission
Mr. V. M. McCree, Acting Regional Administrator
Ms. K. R. Cotton, NRR Project Manager – Farley
Mr. E. L. Crowe, Senior Resident Inspector – Farley