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NL-08-1033

July 14, 2008

Docket Nos.: 50-348 50-364

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

#### Joseph M. Farley Nuclear Plant – Units 1 and 2 Response to Request for Additional Information Regarding the Fourth Ten-Year Interval Inservice Testing Program Update

Ladies and Gentlemen:

In letter dated August 14, 2007, Southern Nuclear Company (SNC) submitted the Fourth 10-Year Interval Inservice Testing (IST) Program for Farley Nuclear Plant (FNP) Units 1 and 2 for NRC review and approval. In accordance with 10 CFR 50.55a(f)(4)(ii), the updated IST program was written to meet the requirements of the ASME OM Code 2001 edition though 2003 addenda, except where proposed requests for alternatives and/or proposed requests for relief are documented in the Farley IST Program. The Fourth IST Interval began on December 1, 2007 and ends on November 30, 2017.

On June 11, 2008, a NRC Request for Additional Information (RAI) was received regarding the proposed program. This RAI was discussed in a telecon with the NRC Staff on June 23, 2008. SNC is withdrawing relief requests RR-P-1 and RR-V-1 since SNC will comply with the appropriate IST requirements for the associated components. SNC is requesting interim approval for RR-P-3 until July 1, 2009 to allow additional testing be performed for the motor driven auxiliary feedwater pumps to determine if a substantial flow rate can be achieved for IST. The SNC response to the requested information is provided in Enclosure 1. A SNC commitment made in this response is listed in Enclosure 2.

If you have any questions, please advise.

Sincerely,

Mark & ajhini

M. J. Ajluni Manager, Nuclear Licensing

MJA/BDM/phr

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Enclosures: 1) Response to Request for Additional Information Regarding the Fourth Ten-Year Interval Inservice Testing Program Update 2) Commitment Table

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# 14793

U. S. Nuclear Regulatory Commission

Mr. L. A. Reyes, Regional Administrator Mr. R. A. Jervey, NRR Project Manager - Farley Mr. E. L. Crowe, Senior Resident Inspector - Farley Joseph M. Farley Nuclear Plant – Units 1 and 2

Enclosure 1

Response to Request for Additional Information Regarding the Fourth Ten-Year Interval Inservice Testing Program Update

### Enclosure 1

#### Response to Request for Additional Information Regarding the Fourth Ten-Year Interval Inservice Testing Program Update

#### NRC Question RR-P-3-01

The relief request states that the 2 inch minimum flow fixed resistance line limits flow to 50 gpm which provides only minimal data for determining pump operational readiness. The relief request also states that each pump is provided with a 4 inch return line to the condensate storage tank but that significant piping vibration was experienced when attempts were made to utilize the piping for full flow testing of the Auxiliary Feedwater (AFW) pumps. Please discuss the ramifications of using the 4 inch return line at flow rates greater than 50 gpm but less than 350 gpm for the quarterly Group A test.

#### SNC Response

Additional evaluation and testing will be required to address this question.

- FNP will perform additional testing utilizing the 4-inch return line and determine if a substantial flow rate can be achieved for IST. A flow rate of ≥ 280 gpm (80% of accident flow rate) would satisfy the code requirement for the Group A Test.
- 2. FNP will conduct this additional testing and evaluation and provide the results to the NRC no later than July 1, 2009 which allows for testing during a refueling outage on each unit, if necessary.
- 3. FNP's final response will include either a revised relief request justifying any flow rate < 280 gpm or withdrawal of the relief request if testing in accordance with the Code is achievable.
- 4. Therefore, FNP requests interim approval for RR-P-3 until July 1, 2009.

Joseph M. Farley Nuclear Plant – Units 1 and 2

Enclosure 2

**Commitment Table** 

## Enclosure 2

# **Commitment Table**

Commitment	Туре		Scheduled
	One-Time Action	Continuing Compliance	Completion Date (If Required)
Test MDAFW pumps to determine if >50 gpm flow can be achieved and provide the results to the NRC.	x		prior to July 01, 2009