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SOUTHERN COMPANY
Energy to Serve Your World℠

July 22, 2008

Docket Nos.: 50-348
50-364

NL-08-1085

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:

In letter dated October 8, 2007, Southern Nuclear Operating Company (SNC) submitted a request for NRC approval of proposed Alternative FNP-ISI-ALT-02. This Alternative 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. Approval was requested by September 14, 2008, to support 4th interval examinations to be performed during the fall 2008 Outage at FNP-2.

On July 1, 2008, a NRC Request for Additional Information (RAI) was received regarding the proposed Alternative. The SNC response to the requested information is provided in the Enclosure.

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

Sincerely,

Mark J Ajluni

M. J. Ajluni
Manager, Nuclear Licensing

MJA/BDM/daj

Enclosure: 1. Request for Additional Information – Southern Nuclear Response

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# 14797

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 & 2

Enclosure 1

Request for Additional Information
Southern Nuclear Response

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1. **Please explain whether the proposed alternative will eliminate the marking of welds normally subject to Paragraph IWA-2610 requirements, but not actually receiving examinations during the 4th ISI interval.**

   SNC Response – The ASME Code did not require the marking of welds until Plant Farley started the 3rd ISI interval. Plant Farley established a weld reference methodology and a permanent weld marking system for welds receiving an NDE examination (surface or volumetric examination) in the 3rd ISI interval; however, this was limited to those welds being examined for 3rd ISI interval credit. SNC submitted RR-11 to implement these requirements in May 1997 and the NRC approved the relief request in January 1999. Alternative FNP-ISI-ALT-02 has been written to continue this for the 4th ISI interval. The identification markings of the welds that are scheduled to be examined will enable SNC to accurately identify any given weld during the subsequent examinations. In addition, the identification markings will facilitate accurate identification of the previously recorded indications that are associated with the subject weld. Since only a limited number of welds will undergo either surface or volumetric examinations, the proposed alternative will eliminate the marking of welds normally subject to Paragraph IWA-2610 requirements, but not actually receiving examinations during the 4th ISI interval. SNC believes that establishing a comprehensive reference markings and identification system for only those welds that undergo ISI examinations will not compromise safety and quality.

   In summary, the NDE examinations performed per Subsections IWB, IWC, and IWD during the 4th ISI interval for preservice and inservice, as well as sample expansion examinations, will include the marking, per Paragraph IWA-2610, of only those welds that will be examined.

2. **Will welds and regions subject to surface or volumetric examination continue to receive markings as required by the ASME Code, Section XI, Paragraphs IWA-2620, IWA-2630, and IWA-2640?**

   SNC Response – Yes.

3. **Will the proposed alternative have any impact on the performance of ISI examinations under Subsections IWB, IWC, and IWD, specifically with respect to sampling and sample expansion requirements?**

   SNC Response – No.