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August 12, 2008



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Docket No.: 50-348

NL-08-1159

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

Joseph M. Farley Nuclear Plant, Unit 1
Response to Preliminary White Finding on
Diesel Generator Exhaust Failure

Ladies and Gentlemen:

On July 16, 2008, the Nuclear Regulatory Commission (NRC) issued Inspection Report 2008011, titled "Joseph M. Farley Nuclear Plant Unit 1, NRC Inspection Report 05000348/2008011 and Preliminary White Finding." The Inspection Report documents the staff's conclusion that the failure of the Farley Nuclear Plant (FNP), Unit 1, Emergency Diesel Generator (EDG) 1B exhaust header, during a surveillance run on March 13, 2008, constitutes a preliminary white finding and apparent violation of Technical Specification 5.4.1. Southern Nuclear Operating Company (SNC) has reviewed the preliminary finding and agrees in principle with the stated basis of the finding.

Consistent with the staff's conclusion, SNC has determined the cause of the event was inadequate work instructions. Although instructions relating to temporary shipping flanges were provided by the vendor in an October 17, 1989 Service Information Letter, such instructions were not included in the documentation shipped with the replacement header nor provided by the on-site vendor representative. Corrective actions, including but not limited to, training, guidance and enhanced inspections, are being implemented to ensure that adequate specifications and requirements are provided by vendors along with the equipment.

Corrective actions have been completed to return the EDG to service. Work order planning sequences for the additional EDG exhaust system replacements were enhanced to require field welding of these flanges and post maintenance testing of the connections. SNC guidance and expectations for work planners have been enhanced to reinforce the importance of incorporating vendor manual information in the work package as well as evaluating the post maintenance testing requirements for work packages. In addition, SNC has issued an operating experience notice to the industry on this event.

SNC has reviewed the evaluation performed by the NRC under the Significance Determination Process (SDP) and agrees that the finding is of low to moderate safety significance. However, use of the 1B EDG start on February 10 instead of the last successful start on March 11, results in a highly conservative SDP calculation. SNC believes credit should be given in this SDP process for the successful 24-hour run that occurred on March 11 because the 24-hour run loads the diesel to 4353 Kw versus 4075 Kw which is more challenging to the exhaust header. This difference would not alter the SDP determination color, but the credit does move it significantly closer to a green finding.

In summary, SNC agrees in principle with the stated basis of the staff's finding. SNC also agrees with the staff's conclusion in the Inspection Report that "[n]o immediate safety concern exists because the exhaust header has been replaced," "the 1B EDG was returned to service" and "the exhaust header replacement had not been implemented on the remaining EDGs." Moreover, corrective actions are being implemented by SNC as described, in part, in this response.

In light of the foregoing and having coordinated with NRC Region II, SNC requests the NRC commence the Inspection Procedure (IP) 95001 inspection the week of September 22, 2008.

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

Sincerely,



J. R. Johnson
Vice President – Farley

JRJ/CHM/daj

cc: Southern Nuclear Operating Company
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