

**Southern Nuclear
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September 12, 2008

Docket Nos.: 50-364

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

Joseph M. Farley Nuclear Plant – Unit 2
Response to Request for Additional Information Regarding FNP-ISI-ALT-01,
Version 1.0, Proposed Alternative in Accordance with 10 CFR 50.55a(a)(3)(i)

Ladies and Gentlemen:

In letter dated October 8, 2007, and supplemented by Southern Nuclear Operating Company (SNC) letter dated June 27, 2008, SNC requested NRC approval of proposed requested Alternative FNP-ISI-ALT-01 to change the Joseph M. Farley Nuclear Plant (FNP) Unit 2 ISI interval dates to correspond to the FNP Unit 1 ISI interval dates. The duration of this alternative is throughout the licensed life of FNP-2.

Approval was requested by September 14, 2008, to support 4th interval examinations to be performed during the Fall 2008 Outage at FNP-2.

On August 28, 2008 a telecon was held with the NRC Staff to discuss this request. The SNC response to the requested information is provided in the Enclosure to this letter. Proposed FNP-ISI-ALT-02 and FNP-ISI-ALT-03 submitted to the NRC on October 8, 2007 are not impacted by this response for FNP-ISI-ALT-01.

This letter contains no NRC commitments.

If you have any questions, please advise.

Sincerely,

A handwritten signature in black ink that reads "Mark J. Ajluni".

M. J. Ajluni
Manager, Nuclear Licensing

MJA/BDM/phr

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NL-08-1370
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Enclosure: Response to Request for Additional Information Regarding
FNP-ISI-ALT-01

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# 14830

U. S. Nuclear Regulatory Commission
Mr. L. A. Reyes, Regional Administrator
Mr. K. D. Feintuch, NRR Project Manager – Farley
Mr. E. L. Crowe, Senior Resident Inspector – Farley

**Joseph M. Farley Nuclear Plant – Unit 2
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Enclosure

Response to Request for Additional Information Regarding FNP-ISI-ALT-01

Enclosure

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NRC Question

Discuss what FNP is doing to satisfy the requirements for the third interval of their risk-informed inservice inspection (RI-ISI) program for ASME Code category B-F, B-J, C-F-1, C-F-2 piping for Unit 2. Also, please confirm that a RI-ISI renewal application for the fourth interval has been submitted if SNC intends to continue to implement a RI-ISI program.

SNC Response (Note: Both Unit 1 and Unit 2 will be discussed in this response to provide a more comprehensive answer).

FNP-1 is in the fourth ISI interval because the third ISI interval for FNP-1 expired by 10 CFR 50.55a regulations on November 30, 2007 and the fourth ISI interval began on December 1, 2007. By 10 CFR 50.55a regulations, the third ISI interval for FNP Unit 2 is scheduled to continue through July 30, 2011 and the fourth ISI interval is scheduled to begin on July 31, 2011. SNC submitted, and expected approval of, FNP-ISI-ALT-01 to administratively align the Unit 2 fourth interval dates to coincide with the FNP Unit 1 dates. Approval was anticipated since the same request had been granted for Vogtle, Hatch, and other plants. Anticipating the NRC approval of the re-alignment, ISI plans, procedures, NDE procedures, repair/replacement procedures, etc. were developed and put in place for both units using the 2001 Edition of Section XI with Addenda through 2003 for the fourth ISI interval.

Based on anticipated approval of FNP-ISI-ALT-01, the third interval for Unit 2 would have expired on November 30, 2007; therefore, Unit 2 would no longer have an NRC-approved RI-ISI program. Also assuming approval of FNP-ISI-ALT-01, Unit 2 would currently be in the first period of the fourth ISI interval and there have been no refueling outages to date. A risk-informed ISI submittal for Farley Units 1 and 2, based on Code Case N-716, will be submitted to the NRC in 2009. This submittal will be made at least one year prior to the start of the Unit 1 1R23 outage which is currently scheduled for October 2010. This will allow the NRC sufficient time to approve the submittal. This outage is the key outage for approval because it is the last outage of the first period for Unit 1 while Unit 2 has a later outage by Section XI Code rules.

Because there is not a NRC-approved Risk-Informed ISI submittal, a sufficient number of welds will be scheduled and examined for both units such that Section XI Category B-F, B-J, C-F-1, and C-F-2 examination requirements for a conventional ISI program will be met for the first period of the fourth ISI interval. It should be noted that the welds to be examined per the proposed Code Case N-716 submittal are a subset of Section XI Category B-F, B-J, C-F-1, and C-F-2 welds. Therefore, Section XI Category B-F, B-J, C-F-1, and C-F-2 welds that are also in the scope of Code Case N-716 will be scheduled for examination, when practical, during the first period of the fourth ISI interval. The proposed Risk-Informed ISI program submittal to the NRC will state SNC's intention to take credit for the appropriate examinations in meeting Code Case N-716 requirements once the NRC has approved the risk-informed submittal.

On June 27, 2008, SNC submitted a response to the NRC request for additional information pertaining to FNP-ISI-ALT-01 (reference SNC letter NL-08-0884). The information supplied for Category R-A (risk-informed ISI) in that response should be replaced by the above information.