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October 8, 2009

Docket Nos.: 50-364

NL-09-1622

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

Joseph M. Farley Nuclear Plant Unit 2
Emergency Technical Specification (TS) Revision Request
Regarding TS 3.7.8, "Service Water System (SWS)"

Ladies and Gentlemen:

Pursuant to 10 CFR 50.90 and 10 CFR 50.91(a)(5), Southern Nuclear Operating Company (SNC), hereby requests an emergency amendment to Joseph M. Farley Nuclear Plant (FNP) Unit 2 Technical Specifications (TS). The proposed one-time change to the TS contained herein revises Limiting Condition for Operation (LCO) 3.7.8, "Service Water System (SWS)," Action A Completion Time from 72 hours to a one-time 6-day Completion Time to allow replacement of two of the FNP Unit 2 SWS Train A seismic support ring assemblies. The proposed change is applicable to Unit 2 only. The Train A pumps were removed from service on October 6, 2009, at 0818 CST hours, to perform inspection of the seismic support ring assemblies. During the inspection, it was noted that the pumps' seismic support ring assemblies were in an unsatisfactory condition, caused by loose mounting bolts. Disassembly and replacement of these underwater seismic support ring assemblies involve a number of major steps, including diver coordination and fabrication of replacement seismic support rings and mounting plates. Although the FNP plant staff had foreseen the need for potential repair and/or replacement of the seismic support ring assemblies and had contingences in place to effect repairs as necessary, the extent of the repairs require additional time beyond the 72-hour Completion Time.

A discussion of the proposed Technical Specifications change and the basis for the emergency Technical Specification and Significant Hazards Considerations are provided in Enclosure 1. SNC has evaluated the proposed TS change and has determined that it does not involve a significant hazards consideration as defined in 10 CFR 50.92. The basis for that determination is provided in Enclosure 1. SNC has also determined that operation with the proposed change will not result in a significant increase in the amount of effluents that may be

released offsite nor a significant increase in individual or cumulative occupational radiation exposure. Therefore, the proposed amendment is eligible for categorical exclusion as set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is needed in connection with the approval of the proposed change. The basis for that determination is also provided in Enclosure 1. The marked-up and clean typed TS pages are provided in Enclosures 3 and 4, respectively. Enclosure 2 provides Unit 1 and 2 seismic support ring assembly drawings.

To avoid an unnecessary plant shutdown over a seismic qualification issue that has a clear success path for full restoration of qualification, SNC requests that the proposed TS change be reviewed and approved by 0800 CST hours on October 9, 2009. The proposed extended FNP Unit 2 Completion Time will expire upon returning the Unit 2 SWS Train A to operable status or on October 12, 2009 at 0818 CST, whichever occurs first.

An inspection will be performed of FNP Unit 1 SWS seismic support ring assemblies as soon as possible, but no later than November 20, 2009. This inspection schedule will allow time for planning, arrangement for divers, ensure personnel safety, obtain design and material for potential repairs, and to schedule manpower with consideration of 10 CFR 26 requirements.

Mr. M. J. Ajluni states he is Nuclear Licensing Manager of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and to the best of his knowledge and belief, the facts set forth in this letter are true.

This letter contains NRC commitments (see Enclosure 5). If you have any questions, please advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



M. J. Ajluni
Nuclear Licensing Manager

Sworn to and subscribed before me this 8th day of October, 2009.



Notary Public

My commission expires: 7/21/12

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MJA/TDH/phr

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cc: Southern Nuclear Operating Company
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U. S. Nuclear Regulatory Commission
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Alabama Department of Public Health
Dr. D. E. Williamson, State Health Officer

**Joseph M. Farley Nuclear Plant Unit 2
Emergency Technical Specification (TS) Revision Request
Regarding TS 3.7.8, "Service Water System (SWS)"**

Enclosure 1

Description of the Proposed Change

**Joseph M. Farley Nuclear Plant Unit 2
Emergency Technical Specification (TS) Revision Request
Regarding TS 3.7.8, "Service Water System (SWS)"**

Enclosure 1

Description of the Proposed Change

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Enclosure 1

Description of the Proposed Change

1.0 Introduction

Pursuant to 10 CFR 50.90 and 10 CFR 50.91(a)(5), Southern Nuclear Operating Company (SNC), hereby requests an emergency amendment to Joseph M. Farley Nuclear Plant (FNP) Unit 2 Technical Specifications (TS). The proposed change to the TS contained herein revises Limiting Condition for Operation (LCO) 3.7.8, "Service Water System (SWS)," Action A Completion Time from 72 hours to a one-time 6-day Completion Time to allow repair/replacement of the FNP Unit 2 SWS Train A seismic support ring assemblies. The proposed change is applicable to Unit 2 only and should be processed as an emergency change to prevent an unscheduled shutdown of FNP Unit 2.

The proposed change qualifies for categorical exclusion from an environmental assessment as set forth in 10 CFR 51.22(c)(9). Therefore, no environmental impact statement or environmental assessment is needed in connection with the approval of the proposed change.

2.0 Background

On August 02, 2009, while swapping SWS pumps (start of 2E/secure of 2C) in preparation for the train swap (Train B to Train A), plant personnel heard sounds that resulted in a decision to secure the 2E SWS Pump shortly after being started. As soon as the 2E pump was secured, the sound stopped. Investigation indicated that the seismic support ring assembly for the 2E SWS Pump was no longer capturing the pump column. Inspection of the underwater seismic support ring assembly indicated the lower two of the four wall plate bolts were degraded and missing the nuts. The upper two bolts were degraded but still had nuts. It was determined that if the two remaining wall plate bolts were able to be torqued to 150 ft-lbs and the vertical bolts that attached the seismic ring to the wall plate were torqued to 250 ft-lbs, the seismic support ring assembly would be able to perform its design function. All remaining bolting met the torque requirements. A Prompt Determination of Operability was completed to show that the 2E SWS Pump seismic support ring assembly was operable but degraded.

Additional inspections were performed to address extent of condition of the degraded seismic support ring assembly on the 2E SWS Pump and to evaluate the condition of the other Unit 2 assemblies. An inspection on September 29, 2009 revealed that the 2E SWS pump seismic support ring assembly was not in an operable condition and the base plate was replaced. After the 2E SWS plate was replaced, the inspections resumed. Two of the four 2D SWS Pump seismic support ring assembly horizontal wall bolt nuts were found to be loose. After the nuts were torqued, the final inspection result for the 2D pump seismic support ring assembly was satisfactory. It should be noted that while the unacceptable 2E plate had only two intact bolts/nuts, the acceptable 2D plate had four intact bolts/nuts. As an interim action, until the bolting can be permanently corrected, inspection of the 2D pump seismic support ring assembly bolting will be performed after the Train A repairs and every 30 days. This commitment to perform inspections is included in the Commitment Table (Enclosure 5).

On October 06, 2009 at 0818 CST hours, the Unit 2 SWS Train A was removed from service for inspection. The 2C, 2B, and 2A SWS Pump seismic support ring assemblies' base plates were found to need replacement due to the inability to establish torque of 150 ft-lbs on the nuts of the horizontal bolting.

Enclosure 1

Description of the Proposed Change

Disassembly and replacement of these underwater seismic support ring assemblies involve a number of major steps, including diver coordination and fabrication of a replacement seismic support ring and mounting plate that could force the maintenance schedule to exceed 72 hours. The required major steps are listed below:

1. Fabrication of a replacement seismic support ring and mounting plate.
2. Diver coordination.
3. Underwater drilling for new anchor bolting.
4. Inspection.
5. Release tagout and realign system.
6. Verify pump operation.

Although the FNP staff had foreseen the need for potential repair/replacement of the seismic support ring assemblies and had contingences in place to effect repairs as necessary, the extent of the repairs requires additional time beyond the 72-hour Completion Time. Underwater drilling into concrete and the striking of rebar is the chief reason for the additional time. The exact location of the rebar was not known. The Unit 2 Completion Time will expire on October 09, 2009 at 0818 CST.

To return the Unit 2 SWS Train A to OPERABLE status, replacement of seismic support ring assemblies must be completed for two of the three pumps. A one-time, 6-day Unit 2 Completion Time for TS 3.7.8, Action A, to allow the SWS Train A to be inoperable is requested to permit the replacement of seismic support ring assemblies and return SWS Train A to service. The proposed extended Completion Time will expire upon returning the SWS Train A to OPERABLE status, or on October 12, 2009 at 0818 CST, whichever occurs first. This one-time emergency TS change will prevent an unnecessary shutdown of FNP Unit 2.

3.0 Need for Technical Specification Change

The proposed one-time change to the FNP Unit 2 Completion Time of TS 3.7.8, Action A, is needed to avoid the unnecessary shutdown of the plant to complete Unit 2 SWS Train A seismic support ring assembly replacement activities. The SWS is required for all modes of plant operation, and a plant shutdown would not eliminate the need for SWS operation. The likelihood of an impact to the equipment in question, for an additional 72-hour duration, due to a seismic event is very low and would remain, regardless of unit shutdown. The change averts known risks from complex and infrequent plant shutdown and startup evolutions that would unnecessarily challenge plant systems. It should be noted that except during tag out for repair, the Train A pumps are available to supply service water to essential plant loads. In addition, maintaining the plant at power allows for normal core cooling and provides for back-up cooling by way of the Turbine Driven Auxiliary Feedwater System. If unit shutdown is initiated, these system capabilities will be lost, placing full reliance on the degraded SWS.

Description of the Proposed Change

4.0 Description of Proposed Change

4.1 Proposed Change

Add a note to allow a one time change to TS LCO 3.7.8 Action A Completion Time to extend from 72 hours to 6 days.

4.2 System Description

The SWS provides a heat sink for the removal of process and operating heat from safety related components during a Design Basis Accident (DBA) and/or transient. During normal operation, and a normal shutdown, the SWS also provides this function for various safety related and non-safety related components. The principal safety related function of the SWS is the removal of decay heat from the reactor via the Component Cooling Water System.

The SWS consists of two separate, 100% capacity, safety related, cooling water trains. Each train consists of two 50% capacity pumps, one shared 50% capacity spare pump, piping, valving, and instrumentation. Train A contains SWS Pumps A and B, and Train B contains SWS Pumps D and E. SWS Pump C is a swing pump.

Four pumps are normally in operation on each unit, with one (swing) pump not in service. In the event of failure of a pump, plant operators must align the swing pump to the train containing the failed pump, maintaining two pumps per train.

While there are no indications of seismic support ring assembly issues for Unit 1, the Unit 1 assemblies will be inspected following any necessary replacement of Unit 2 assemblies. The Unit 1 design is considered more robust than Unit 2. Drawings are provided in Enclosure 2. Some of the design feature differences between the Unit 1 and Unit 2 seismic support ring assemblies are listed below:

Unit 1

- A single weldment that is well stiffened and attached to the wall with 8 each 1-inch diameter cast-in-place "J-bolt."
- Bolts are galvanized.
- The wall mounting plate is 1-inch thick.

Unit 2

- A two-piece design that attaches to the wall with 4 each 3/4-inch diameter grouted-in-place threaded rods.
- Bolts are zinc coated.
- The wall mounting plate is 5/8 inches thick.

Description of the Proposed Change

4.3 Basis for the Technical Specification Change

Technical Specification (TS) 3.7.8, "Service Water System (SWS)" requires two SWS trains to be operable. The SWS is capable of delivering cooling water during all modes of plant operation to all equipment required to function under accident conditions. All safety-related portions of the SWS, including the service water intake structure and pumps, are Seismic Category I and meet the single-failure criteria. Because the SWS operates continuously during normal plant operation, its availability is apparent to plant operators. The loss of any single component will not render the system incapable of supplying sufficient SWS flowrates. The proposed one-time Completion Time change from 72 hours to 6 days for the Unit 2 SWS Train A to be inoperable to permit replacement is based upon the assumed operability of SWS Train B and the SWS Pump C (swing pump). The TS LCO 3.7.8 Action A of 72 hours is for a broad range of design basis accidents, the 72-hour Completion Time extension is associated with seismic events only. In addition, as previously noted, the Train B SWS pump seismic support ring assemblies were inspected and found to be acceptable.

The SWS Train A pumps are capable of performing their intended function in the absence of a seismic event and are available except when tagged out to effect repairs. The likelihood of a seismic event at FNP, during an additional 72-hour Completion Time, is remote.

5.0 Qualitative Assessment

This qualitative assessment is for a one time LCO extension for SWS Train A only during the repair period of the SWS 2B Pump seismic support ring assembly. TS 3.7.8 requires two operable SWS trains, consisting of two pumps per train. The following are reasons for the acceptability of the 72-hour extension of the Completion Time for LCO 3.7.8 Action A:

- SWS Pump 2A is capable of auto start and performing its intended function in the absence of a seismic event.
- The likelihood of a seismic event at FNP, during an additional 72-hour Completion Time, is remote.
- Train A of the SWS is available. The seismic support ring assembly for Pump 2C is assumed to have been replaced and that the pump is operable. Pump 2A is available for non-seismic event operation.
- Train B of the SWS is operable. The seismic support ring assembly for Pump 2E has been replaced and the assembly for Pump 2D has been inspected and found acceptable.
- Following restoration of Train A, an additional inspection will be performed for the Pump 2D seismic support ring assembly and will be re-inspected every 30 days until repair/replacement.
- The TS LCO 3.7.8 Action A is for a broad range of design basis accidents. The 72-hour Completion Time extension is associated with seismic events only.
- For the condition of an unrestrained pump column potentially damaging an adjacent pump column during a postulated seismic event, engineering has concluded it is not credible that the unrestrained column could contact an adjacent column.

Enclosure 1

Description of the Proposed Change

- Maintaining the plant at power allows for normal core cooling and provides for back-up cooling by way of the Turbine Driven Auxiliary Feedwater System. Shutting down places full reliance for core cooling on the degraded SWS.
- During the extended Completion Time period, additional safety related equipment will not be voluntarily removed from service.
- During the extended Completion Time period, switchyard activities affecting transmission will be restricted.

The above description is the intended plan, but conditions may necessitate a change in sequence of pump restoration in order to obtain an operational SWS Train A. The plan will ensure that, for Train A, one pump is operational and one pump is available prior to entering the extended completion time. Unit 1 SWS seismic support ring assemblies will be inspected following restoration of Unit 2 SWS Train A.

6.0 Regulatory Safety Analysis

6.1 No Significant Hazards Consideration

The proposed change will provide a one-time revision to the FNP Unit 2 Completion Time of TS 3.7.8, Action A, to allow an inoperable Unit 2 Train A service water for 6 days. The extended Completion Time will permit replacement of two seismic support ring assemblies for Train A.

1. Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed change does not alter any plant equipment or operating practices in such a manner that the probability of an accident is increased. The proposed changes will not alter assumptions relative to the mitigation of an accident or transient event. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed license amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change does not involve any physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Based on the operability of the remaining SWS train, the proposed change ensures that the accident analysis assumptions continue to be met. The system's design and operation are not affected by the proposed changes. The safety analysis acceptance criteria are not altered by the proposed changes.

Description of the Proposed Change

Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Based on the above, SNC concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

6.2 Environmental Assessment

This amendment request meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) as follows:

- (i) The amendment involves no significant hazards consideration.

As described above, the proposed change involves no significant hazards consideration.

- (ii) There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

The proposed change does not involve the installation of any new equipment or the modification of any equipment that may affect the types or amounts of effluents that may be released offsite. Therefore, there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

- (iii) There is no significant increase in individual or cumulative occupational radiation exposure.

The proposed change does not involve plant physical changes or introduce any new mode of plant operation. Therefore, there is no significant increase in individual or cumulative occupational radiation exposure.

Based on the above, SNC concludes that the proposed change meets the criteria specified in 10 CFR 51.22 for a categorical exclusion from the requirements of 10 CFR 51.22 relative to requiring a specific environmental assessment by the Commission.

7.0 Conclusion

The proposed change will provide a one-time revision to the FNP Unit 2 Completion Time of TS 3.7.8, Action A, to allow an inoperable Unit 2 Train A service water for 6 days. The extended Completion Time will permit replacement of the Unit 2 pump seismic support ring assembly. The Plant Review Board reviewed the proposed change to the Technical Specifications and concluded that it does not involve a significant hazard consideration and will not endanger the health and safety of the public.

**Joseph M. Farley Nuclear Plant Unit 2
Emergency Technical Specification (TS) Revision Request
Regarding TS 3.7.8, "Service Water System (SWS)"**

Enclosure 2

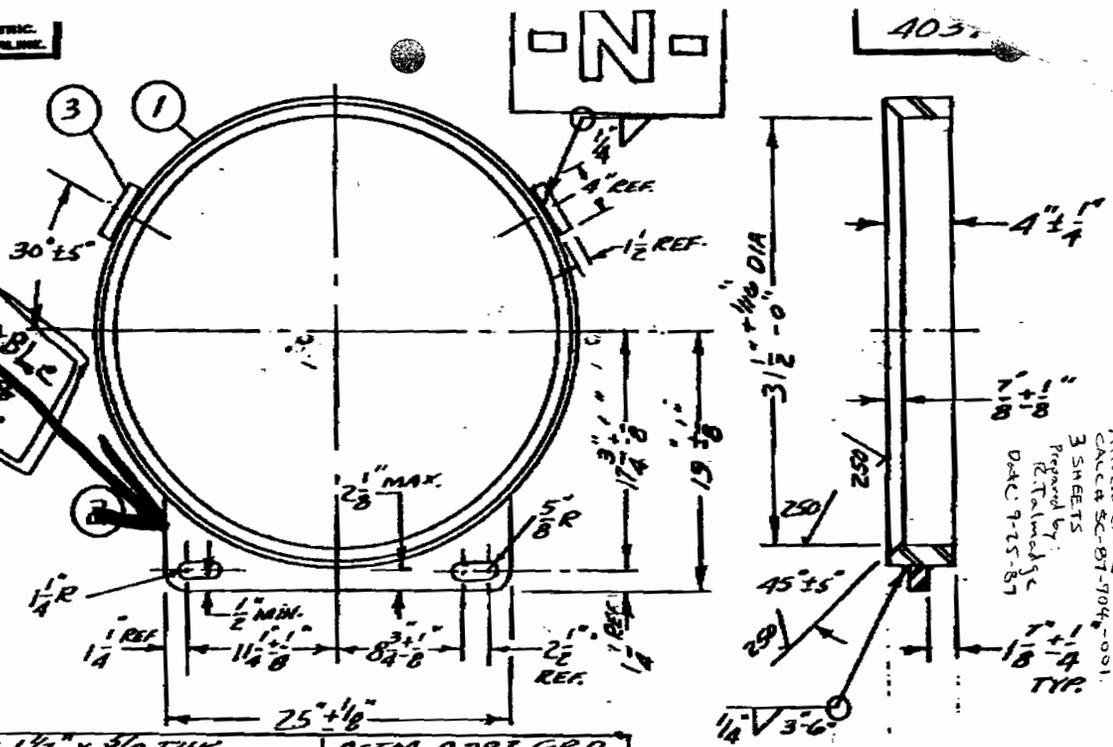
Drawings – Unit 1 and Unit 2 Seismic Support Ring Assembly

Drawing - Unit 2 Seismic Support Ring Assembly

ALL SURFACES MUST BE CONCENTRIC, PARALLEL AND AT RIGHT ANGLES TO CENTERLINE.

1. Q.A. REQUIREMENTS: ASME NUCLEAR POWER COMPONENT SECTION III CLASS 3
2. MAT'L CERTIFICATION OF COMPLIANCE REQ'D
3. OPEN STRESS RELIEVE BEFORE FINAL MACH
4. CLEAN BEFORE COATING PER JF CP-10
5. COAT ALL SURFACES WITH COAL TAR EPOXY TO MIN. 16 MILS DRY THICKNESS

PROBABLE
HARDNESS
DAMAGE



QTY	DESCRIPTION	MATERIAL
2	PLATE 4" X 1 1/2" X 5/8 THK	ASTM A 283 GRD
1	PLATE 25" X 7 1/2" X 5/8 THK.	ASTM A 283 GRD
1	RING 34 O.D X 30" I.D X 4" LG	ASME SA 285 GRC

CHIEF MECH. ENGR. *[Signature]*
Q.A. ENGR. *[Signature]*

ING - 27" PUMP SUPPORT

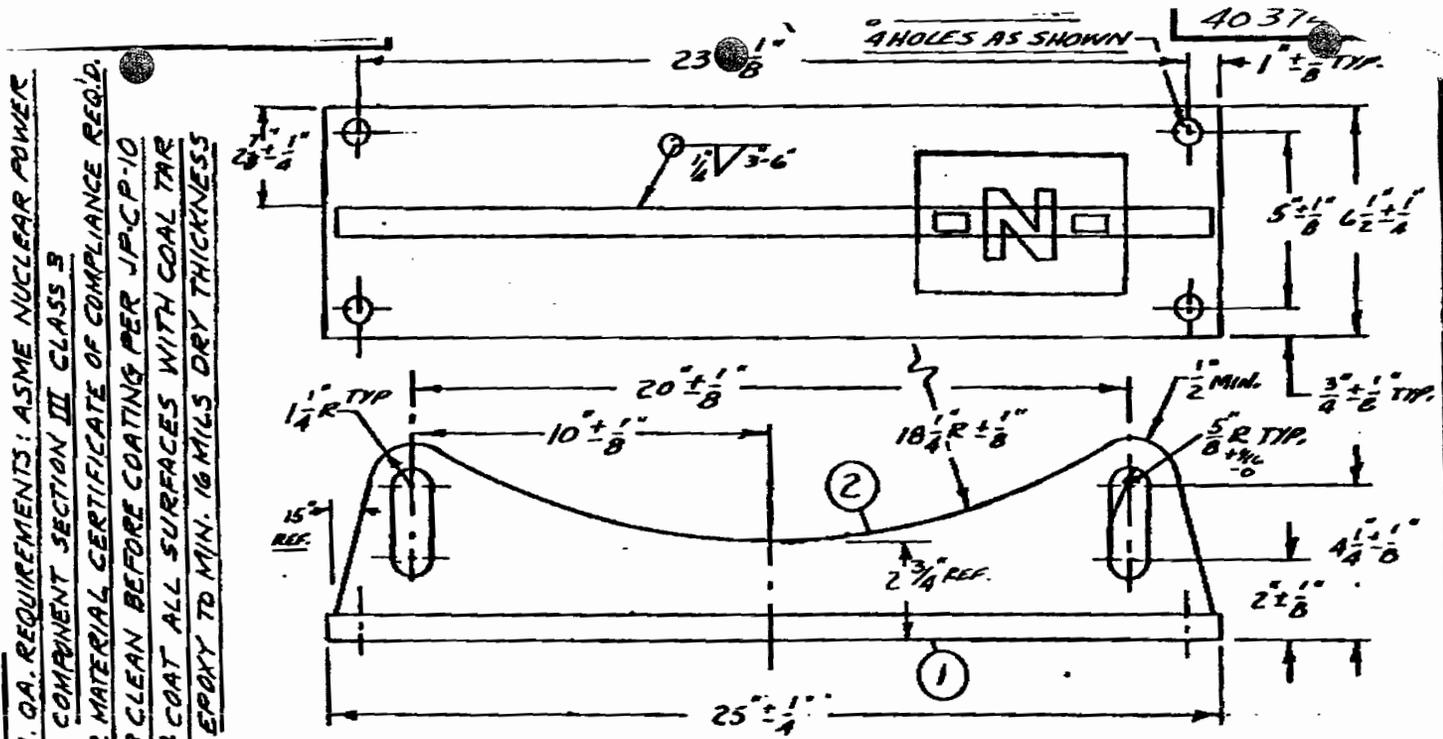
REVISIONS	BY	DATE

JOHNSTON
TURBINE PUMPS
GLENORA, CALIF., U.S.A.

SCALE	NONE	PART NUMBER	40373-AN
TOOLING	DATE	MATERIAL	STEEL-SEE ABOVE
DRAWN	E 5/74	PATTERN NUMBER	7
CHECKED	R.K.S. 7/1/74	DRAWING NUMBER	40373-AN
FED. ENGR. APPROVED	<i>[Signature]</i>		

JOHNSTON PUMP 1 9-23-87 5:02PM 1 Attachment 8 6156981447-3 CCITT 83:4 2

Drawing - Unit 2 Seismic Support Ring Assembly



- 1. Q.A. REQUIREMENTS: ASME NUCLEAR POWER COMPONENT SECTION III CLASS B
- 2 MATERIAL CERTIFICATE OF COMPLIANCE REQ'D.
- 3 CLEAN BEFORE COATING PER J.P.C.P-10
- 4 COAT ALL SURFACES WITH COAL TAR EPOXY TO MIN. 16 MILS DRY THICKNESS

ITEM	QTY	DESCRIPTION	MATERIAL
2	1	PLATE 24 1/2" x 4 7/8" x 5/16" THK	ASTM A 283 GR D
1	1	PLATE 25" ± 1/4" x 6 1/2" ± 1/4" x 5/8" THK	ASTM A 283 GR D

CHIEF MECH. ENGR. *[Signature]*
 QA ENGR. *[Signature]*

RACKET-21" PUMP SUPPORT-WALL PLATE		SCALE NONE	PART NUMBER 40374-AN
MATERIAL STEEL - SEE ABOVE		TOOLING	DATE 4/74
PATTERN NUMBER X		DRAWN E	CHECKED R.K.S. 5/1/74
R. DRAWING NUMBER 40374-AN		PROJ. ENGR. APPROVED <i>[Signature]</i> 5/74	

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**Joseph M. Farley Nuclear Plant Unit 2
Emergency Technical Specification (TS) Revision Request
Regarding TS 3.7.8, "Service Water System (SWS)"**

Enclosure 3

Marked-Up Technical Specifications Page

3.7 PLANT SYSTEMS

3.7.8 Service Water System (SWS)

LCO 3.7.8 Two SWS trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. One SWS train inoperable.</p>	<p>A.1</p> <p>-----NOTES-----</p> <ol style="list-style-type: none"> 1. Enter applicable Conditions and Required Actions of LCO 3.8.1, "AC Sources — Operating," for emergency diesel generator made inoperable by SWS. 2. Enter applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops — MODE 4," for residual heat removal loops made inoperable by SWS. <p>-----</p> <p>Restore SWS train to OPERABLE status.</p>	<p>72 hours *</p>
<p>B. One SWS automatic turbine building isolation valve inoperable in each SWS train.</p>	<p>B.1</p> <p>Restore both inoperable turbine building isolation valves to OPERABLE status.</p>	<p>72 hours</p>

* For the FNP Unit 2 October 06, 2009 entry into Technical Specification 3.7.8, the Service Water Train A may be inoperable for a period not to exceed 6 days.

**Joseph M. Farley Nuclear Plant Unit 2
Emergency Technical Specification (TS) Revision Request
Regarding TS 3.7.8, "Service Water System (SWS)"**

Enclosure 4

Clean Typed Technical Specifications Page

3.7 PLANT SYSTEMS

3.7.8 Service Water System (SWS)

LCO 3.7.8 Two SWS trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. One SWS train inoperable.</p>	<p>A.1</p> <p>-----NOTES-----</p> <p>3. Enter applicable Conditions and Required Actions of LCO 3.8.1, "AC Sources — Operating," for emergency diesel generator made inoperable by SWS.</p> <p>4. Enter applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops — MODE 4," for residual heat removal loops made inoperable by SWS.</p> <p>-----</p> <p>Restore SWS train to OPERABLE status.</p>	<p>72 hours *</p>
<p>B. One SWS automatic turbine building isolation valve inoperable in each SWS train.</p>	<p>B.1</p> <p>Restore both inoperable turbine building isolation valves to OPERABLE status.</p>	<p>72 hours</p>

* For the FNP Unit 2 October 06, 2009 entry into Technical Specification 3.7.8, the Service Water Train A may be inoperable for a period not to exceed 6 days.

**Joseph M. Farley Nuclear Plant Unit 2
Emergency Technical Specification (TS) Revision Request
Regarding TS 3.7.8, "Service Water System (SWS)"**

Enclosure 5

Commitment Table

Enclosure 5

Commitment Table

Commitment	Type		Scheduled Completion Date (If Required)
	One-Time Action	Continuing Compliance	
Inspection of the Service Water System 2D pump seismic ring assembly bolting will be performed following completion of the Train A repairs.	X		
Inspection of the Service Water System 2D pump seismic ring assembly bolting will be performed every 30 days.		X	Inspection ends when Service Water System 2D pump seismic ring assembly bolting can be permanently corrected.
The Unit 1 SWS seismic support ring assemblies will be inspected.	X		No later than November 20, 2009