



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 28, 2011

Mr. M. J. Ajluni
Nuclear Licensing Director
Southern Nuclear Operating Company, Inc.
40 Inverness Center Parkway
Post Office Box 1295, Bin - 038
Birmingham, AL 35201-1295

SUBJECT: JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2 – REQUEST FOR
ADDITIONAL INFORMATION ON INSERVICE INSPECTION PLAN (TAC NOS.
ME5908 AND ME5909)

Dear Mr. Ajluni:

By letter dated March 22, 2011 (Agencywide Documents Access and Management System, Accession No. ML110820259), Southern Nuclear Operating Company, Inc., submitted a request for relief for Joseph M. Farley Nuclear Plant, Units 1 and 2, that would allow treatment of the existing American Society of Mechanical Engineers, *Boiler and Pressure Vessel Code*, Section III, Class 2 small diameter piping tubing, fitting, valves and their supports as Class 2 components in lieu of upgrading them to Class 1 components. The U.S. Nuclear Regulatory Commission staff has reviewed the information and has identified that additional information is needed to complete the review as stated in the enclosure.

We request that a response be provided within thirty (30) days of the date of this letter.

Sincerely,

A handwritten signature in black ink, reading "Robert E. Martin", is positioned above the typed name and title.

Robert E. Martin, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-348 and 50-364

Enclosure:
Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION
FOR RELIEF REQUEST FNP-ISI-ALT-11, VERSION 1.0.
JOSEPH M. FARLEY NUCLEAR PLANT UNITS 1 AND 2
DOCKET NOS. 50-348 and 50-364

By letter dated March 22, 2011, Southern Nuclear Operating Company, Inc. (SNC), submitted a request for relief for Joseph M. Farley Nuclear Plant, Units 1 and 2 (FNP), that would allow treatment of the existing American Society of Mechanical Engineers, *Boiler and Pressure Vessel Code* (ASME Code), Section III, Class 2 small diameter piping tubing, fitting, valves and their supports as Class 2 components in lieu of upgrading them to Class 1 components. The alternative proposal is applicable to the components connected to the reactor coolant system pressurizer above the normal water level in the pressurizer. SNC stated that these components were misclassified as Code Class 2, hence the need for an upgrade to Code Class 1 category.

We request that SNC address the following issues related to the subject components that are addressed in the proposed alternative FNP-ISI-ALT-11, Version 1.0.

- (1) Provide the year and the addenda of the ASME Code, Section XI that is applicable for the current in-service inspection programs at FNP.
- (2) SNC stated that the subject piping was originally designed to ASME Code, Section III, Subsection NC (Code Class 2), 1971 Edition through Summer 1971 Addenda. Subsection NC, paragraph NC-5222 in ASME Code, Section III, requires radiography for the full penetration butt welds. Whereas Subsection NB (Code Class 1), paragraph NB-5220 in ASME Code, Section III, requires radiography and surface examination on 1/2 inch on each side of the full penetration butt welds. Surface quality of the weld is to be verified on Code Class 1 components due to fatigue considerations. However, surface examination was not performed on any of the existing Code Class 2 small bore full penetration pipe butt welds identified in the proposed alternative. Since the subject welds are not to be upgraded to Code Class 1 category, SNC is requested to provide a justification for using Code Class 2 examination requirements for these welds.
- (3) In the proposed alternative, SNC stated that for the Code Class 2 piping support elements, American National Standard Institute (ANSI) B.31.1, "Power Piping," was used. For Code Class 1 piping support elements, ANSI B.31.7, "Nuclear Power Piping," was used. SNC is requested to provide a brief summary of the comparison of the technical attributes (design criteria, fabrication and examination) with respect to the piping support elements, between these codes.
- (4) SNC is requested to confirm that as-built code reconciliation analyses were performed for the subject components taking into consideration the differences between the various attributes that are addressed in ASME Code, Section III, Code Class 1 and Code Class 2.

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/RA/

Robert E. Martin, Senior Project Manager
Plant Licensing Branch II-1
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ADAMS Accession No.: ML11172A081

*by email dated 6/21/11

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