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Docket Nos.: 50-348  
50-364

NL-12-0545

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

Joseph M. Farley Nuclear Plant Unit 1 & 2  
Information Regarding Manual Action in Support of  
Exigent Technical Specification Revision Request for  
TS 3.5.4 - Refueling Water Storage Tank (RWST)

Ladies and Gentlemen:

On February 28, 2012, Southern Nuclear Operating Company (SNC) submitted a letter (NL-12-0403) to the Nuclear Regulatory Commission (NRC) requesting an exigent amendment to Farley Nuclear Plant (FNP) Unit 1 & 2 Technical Specifications (TS). The proposed change to the TS would allow the use of manual operator actions for compliance with TS 3.5.4, "Refueling Water Storage Tank" under specific circumstances. By its March 2, 2012, letter (NL-12-0462), SNC provided additional requested material in support of that request. As a result of a subsequent communication with the NRC, further information regarding training for the manual operator action was requested. This letter's Enclosure provides a summary of the training given operators for such manual valve operation. In addition, the NRC requested information on any Operating Experience associated with the valve which may be manipulated under provisions of this TS revision. This information is also provided in the Enclosure.

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NRR

Mr. M. J. Ajluni states he is the Nuclear Licensing Director 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 no NRC commitments. If you have any questions regarding this submittal, please contact Mr. B. D. McKinney at (205) 992-5982.

Sincerely,



M. J. Ajluni  
Nuclear Licensing Director

Sworn to and subscribed before me this 9<sup>th</sup> day of March, 2012.

  
Notary Public

My commission expires: 11/30/13

MJA/EMW

Enclosure: Training and Operating Experience

cc: Southern Nuclear Operating Company  
Mr. S. E. Kuczynski, Chairman, President & CEO  
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer  
Mr. T. A. Lynch, Vice President – Farley  
Mr. B. L. Ivey, Vice President – Regulatory Affairs  
Mr. B. J. Adams, Vice President – Fleet Operations  
RTYPE: CFA04.054

U. S. Nuclear Regulatory Commission  
Mr. V. M. McCree, Regional Administrator  
Mr. R. E. Martin, NRR Project Manager – Farley  
Mr. E. L. Crowe, Senior Resident Inspector – Farley

Information Regarding Manual Action in Support of  
Exigent Technical Specification Revision Request for  
TS 3.5.4 - Refueling Water Storage Tank (RWST)

Enclosure

Training and Operating Experience

## Enclosure

### Training and Operating Experience

On February 28, 2012, Southern Nuclear Operating Company (SNC) submitted a letter to the NRC requesting an exigent amendment to Farley Nuclear Plant (FNP) Unit 1 & 2 Technical Specifications (TS). The proposed change to the TS would allow the use of manual operator actions for compliance with TS 3.5.4, "Refueling Water Storage Tank" under specific circumstances. By its March 2, 2012, letter (NL-12-0462), SNC provided additional requested material in support of that request. In subsequent discussions with the NRC regarding that request, the NRC requested additional information on operator training for the manual valve action, as well as any Operating Experience associated with the valve. The specific information requested was:

1. Describe the training conducted on how to operate the valve in the proposed manual action.
2. Identify Operating Experience from Condition Reports which may affect operation of the valve.

#### Training

The System Operator in Training Program Curriculum requires a course on "FNP Specific Valves and Actuators." This course addresses valves and actuators that are used at Farley Nuclear Plant that are unique in their construction or operation, as well as guidance for valve operation in general. The valve (Unit 1 - Q1G31V010 and Unit 2 - Q2G31V010) to be manipulated in the manual action associated with the proposed TS amendment is a two-inch diaphragm valve. The lesson plan for the cited course specifically addresses diaphragm valves and states:

*"Diaphragm valves are used extensively due to the separation provided between the process fluid or gas and the valve moving parts. Diaphragm valves are rising stem valves with the stem playing a significant role in diaphragm protection. The stem has a stop nut which is set by maintenance during valve setup. The stop nut ensures that during subsequent valve operations, the valve is not over-torqued which could result in diaphragm damage."*

The lesson plan further explains general valve operation such as not using force-amplifying devices on diaphragm valves since such devices could potentially damage the valve. The only exception to this operational constraint is in an emergency and with Shift Supervisor permission.

## Enclosure

This training is conducted with all System Operators in Training prior to becoming a fully qualified System Operator. Only fully qualified System Operators can be designated to perform the proposed operator action. The training conducted with the System Operators thereby directly addresses the operation of the manual valve in question and provides confidence that the proposed manual action can be completed successfully.

### Operating Experience

SNC reviewed condition reports for the subject valves, Q1G31V010 and Q2G31V010, for the period from 2006 to 2012. There were three Unit 2 condition reports written during this period related to these valves that were identified. The first was written in 2006 to document that certain parts were missing from the valve. These missing parts were an adjustable travel spindle, stop-nut and jam-nuts. It should be noted that the valve could be operated despite the absence of these parts. This condition was identified by a System Operator; this event further emphasizes the adequacy of the training provided on diaphragm valves. The second condition report in 2008 identified a leak at the gasket on the valve body. Again, this identified condition would not adversely affect the ability of valve to function. The third condition report, written in 2009, requested a procedure change and had no direct bearing on the valve operation.