

Thomas A. Lynch
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April 9, 2012

Docket Nos.: 50-348
50-364

NL-12- 0557

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

Joseph M. Farley Nuclear Plant – Units 1 and 2
Licensee Event Report 2012-001-00
Seismically Qualified RWST Aligned to Non-Seismic Piping

Ladies and Gentlemen:

In accordance with the requirements of 10 CFR 50.73 (a)(2)(i)(B), Southern Nuclear Operating Company (SNC) is submitting the enclosed Licensee Event Report. This letter contains no NRC commitments. If you have any questions, please contact Doug McKinney at (205) 992-5982.

Sincerely,

A handwritten signature in black ink, appearing to read "Thyner", written over the printed name of Thomas A. Lynch.

T. A. Lynch
Vice President – Farley

TAL/WDO

Enclosure: Units 1 and 2 Licensee Event Report 2012-001-00

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cc: Southern Nuclear Operating Company
Mr. S. E. Kuczynski, Chairman, President & CEO
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer
Mr. B. L. Ivey, Vice President – Regulatory Affairs
Mr. B. J. Adams, Vice President – Fleet Operations
Ms. P. M. Marino, Vice President – Engineering
Mr. M. J. Ajluni, Director – Nuclear Licensing
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

**Joseph M. Farley Nuclear Plant – Units 1 and 2
Licensee Event Report 2012-001-00
Seismically Qualified RWST Aligned to Non-Seismic Piping**

Enclosure

Units 1 and 2 Licensee Event Report 2012-001-00

LICENSEE EVENT REPORT (LER)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA/Privacy Section (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by Internet e-mail to infocollects.resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. FACILITY NAME Joseph M. Farley Nuclear Plant, Unit 1	2. DOCKET NUMBER 05000 348	3. PAGE 1 OF 4
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4. TITLE
Seismically Qualified RWST Aligned to Non-Seismic Piping

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
02	15	2012	2012	- 001 -	00	04	09	2012	Farley Nuclear Plant, Unit 2	05000 364
									FACILITY NAME	DOCKET NUMBER

9. OPERATING MODE
1

11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR§: (Check all that apply)

10. POWER LEVEL 100	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(ix)(B)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER
<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A	

12. LICENSEE CONTACT FOR THIS LER

FACILITY NAME J.M. Farley Nuclear Plant, W. D. Oldfield – Principal Licensing Engineer	TELEPHONE NUMBER (Include Area Code) (334) 814-4765
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13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED

☐ YES (If yes, complete 15. EXPECTED SUBMISSION DATE) ☒ NO

15. EXPECTED SUBMISSION DATE

MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On February 15, 2012, with both Units 1 and 2 operating 100 percent power, it was determined that opening the boundary valve between the safety related and seismically qualified Refueling Water Storage Tank (RWST) and the non-safety related and non-seismically qualified Spent Fuel Pool Purification (SFPP) system in Modes 1-4, renders the RWST inoperable. Plant procedures had been revised in 2009 to allow opening this boundary valve in Modes 1-4 under administrative controls. The 10 CFR 50.59 safety evaluation that had been performed to support the procedure change had concluded that the administrative controls would allow the RWST to remain operable. However, in consideration of the new interpretation provided in NRC Information Notice 2012-01, it was judged that the RWST would be considered to be inoperable regardless of the administrative controls established when the RWST was aligned to non-seismic piping in Modes 1 – 4. Since the boundary valve had been opened in Mode 1 under administrative controls and the one hour completion time of Technical Specification 3.5.4 Condition B was not entered, under this recent interpretation, this represented a condition prohibited by Technical Specifications and is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B). This event had no significant safety consequence since a seismic event had not occurred while the SFPP system was in service on the RWST.

LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET

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		2012	- 001	- 00	

NARRATIVE

Westinghouse -- Pressurized Water Reactor
Energy Industry Identification Codes are identified in the text as [XX]

Description of Event

On February 15, 2012, with both Units 1 and 2 operating 100 percent power, during review of the new interpretation provided in NRC Information Notice 2012-01, it was determined that one of the items described in the information notice was applicable to the Farley Nuclear Plant (FNP). Specifically, the information notice identified a utility that had received a non-cited violation (NCV) for crediting administrative controls to close a boundary valve to isolate the non-seismic piping system from the seismically qualified Refueling Water Storage Tank (RWST) [BP and BQ]. During the review, it was recognized that, considering the information provided in NRC Information Notice 2012-01, the RWST would be considered inoperable regardless of the administrative controls established when the RWST was aligned to non-seismic piping in Modes 1 – 4.

At FNP, the RWST is seismically qualified, safety related and within the scope of the plant Technical Specifications (TS). The plant design includes the capability to align the Spent Fuel Pool Purification (SFPP) system [DA] for cleanup of the RWST. The SFPP system is a non-safety, non-seismic system that is normally isolated from the RWST by a normally closed, safety related manually operated valve.

A review of system operating procedures identified that FNP allowed the SFPP system boundary valve to be opened under administrative controls while the unit was operating in Modes 1-4 without declaring the RWST inoperable per TS LCO 3.5.4 Condition B. TS LCO 3.5.4 Condition B requires that the RWST be returned to operable status with a completion time of 1 hour. If the RWST is not returned to operable status within 1 hour, TS LCO 3.5.4 Condition C requires that the unit be placed in Mode 3 within 6 hours and in Mode 5 within 36 hours. FNP had a previous practice of aligning the seismically qualified RWST to the non-seismic SFPP system and a skid mounted Boric Acid Recovery System (BARS) for silica removal prior to refueling outages while in Modes 1 – 4. In addition, the RWST was also aligned to the non-seismic SFPP system piping during routine recirculation of the RWST to support TS required boron concentration verification. The BARS was placed in service for a period of approximately 22 days, on average, prior to each outage over the last five refueling cycles for each unit. The RWST on each unit was aligned to the SFPP system for recirculation on approximately a weekly basis for sampling purposes. Since the RWST was not declared inoperable during these periods, TS LCO actions were not entered. This resulted in operation of the units, which under the interpretation provided by NRC Information Notice 2012-01, is considered to be a condition prohibited by TS and is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B).

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Cause of Event

The direct cause of this event was an incorrect application of compensatory measures (i.e., manual operator actions) when placing the non-seismic SFPP system in service on seismically qualified systems/components (RWST) during modes of operation when they are needed to perform their safety function. Prior to the issuance of NRC Information Notice 2012-01, manual operator actions had been evaluated and deemed acceptable in accordance with procedures in place at that time. However, it has been determined that licensees cannot use compensatory measures when compromising the seismic qualification of a system/component.

Safety Assessment

This event had no significant safety consequence since a seismic event had not occurred while the SFPP system was in service on the RWST. Additionally this event did not involve a safety system functional failure since administrative controls were established and a designated operator was assigned to close the valve within a short period of time. This ensured the minimum required inventory in the RWST would have been available for accident mitigation requirements. This event would be considered low risk based on the following mitigating factors: very low frequency for a seismic initiating event; very low frequency of an accident requiring the use of the RWST safety function; operator action to isolate the non-seismic piping after a seismic initiating event; and a relatively small exposure time. The operator had sufficient response time based on a documented engineering analysis, had multiple cues, and had simple, proceduralized actions. Therefore, the health and safety of the public were not affected by this event.

It should be noted that subsequent to the NRC Information Notice 2012-01, a proposed Technical Specification (TS) was submitted that approved use of the alternate controls which were in place at the time of the event.

Corrective Action

The BARS, in service for silica removal prior to the upcoming refueling outage, was isolated from the Unit 1 RWST. All RWST alignment to non-seismic piping was suspended for both units.

Procedures on both units were revised to use the seismically qualified Containment Spray system as an alternate means of recirculating the RWST prior to sampling.

Causal analysis was initiated and corrective action to strengthen procedure guidance related to 10 CFR 50.59 implementation was entered into the corrective action program (CAP). An additional condition report was entered into the CAP to resolve this seismic issue on a permanent basis.

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NARRATIVE

Additional Information

Similar Events:

None