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Docket No.: 50-364

NL-13-1555

U. S. Nuclear Regulatory Commission
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11555 Rockville Pike
Rockville, MD 20852

Joseph M. Farley Nuclear Plant – Unit 2
Updated Seismic Recommendation 2.3 Walkdown Report Requested by
NRC Letter, *Request for Information Pursuant to Title 10 of the Code of Federal
Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the
Near-Term Task Force Review of Insights from
the Fukushima Daiichi Accident, dated March 12, 2012*

- Reference: 1. NRC Letter, *Request for Information Pursuant to Title 10 of the
Code of Federal Regulations 50.54(f) Regarding
Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force
Review of Insights from the Fukushima Daiichi Accident*; dated
March 12, 2012.
2. Electric Power Research Institute (EPRI) Report 1025286, *Seismic
Walkdown Guidance: For Resolution of Fukushima Near-Term
Task Force Recommendation 2.3: Seismic*, dated June 2012.
3. Southern Nuclear Operating Company Letter dated November 27,
2012, *Seismic Recommendation 2.3 Walkdown Report Requested
by NRC Letter, Request for Information Pursuant to Title 10 of the
Code of Federal Regulations 50.54(f) Regarding
Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force
Review of Insights from the Fukushima Daiichi Accident, dated
March 12, 2012* (NL-12-2267, ADAMS Accession No.
ML13004A251)

Ladies and Gentlemen:

On March 12, 2012, the U. S. Nuclear Regulatory Commission (NRC) issued Reference 1 to all power reactor licensees and holders of construction permits in active or deferred status. Enclosure 3 of Reference 1 requests licensees to perform seismic walkdowns using an NRC-endorsed walkdown methodology. The NRC requested information for the following purposes:

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- to gather information with respect to NTTF Recommendation 2.3, as amended by staff requirements memorandum (SRM) associated with SECY-11-0124 and SECY-11-0137.
- to request licensees to develop a methodology and acceptance criteria for seismic walkdowns to be endorsed by the NRC staff.
- to request licensees to perform seismic walkdowns using the NRC-endorsed seismic walkdown methodology.
- to identify and address degraded, nonconforming, or unanalyzed conditions through the corrective action program.
- to verify the adequacy of licensee monitoring and maintenance procedures.

Enclosure 3 of Reference 1 requires each addressee to submit its walkdown report within 180 days of the NRC's endorsement of Reference 2 of this letter. Reference 3 of this letter provided Southern Nuclear Operating Company's 180 day response to Reference 1 for Joseph M. Farley Nuclear Plant (FNP) Unit 2. Included in Reference 3 was a list of inaccessible areas that would have to be inspected at a later date. A schedule for completion of the walkdown for these inaccessible areas was provided in Enclosure 2 of Reference 3.

The FNP Unit 2 seismic walkdowns and area walk-bys of the inaccessible areas previously mentioned have been completed except for two items which were removed from the Seismic Walkdown Equipment List. Further detail is included in Enclosure 2. FNP Unit 2 had no significant degraded, non-conforming or unanalyzed conditions that warrant modification to the plant. FNP Unit 2 had no as-found conditions that would prevent SSCs from performing their required safety functions.

In accordance with References 2 and 3, this letter provides the updated seismic walkdown report for FNP Unit 2. This letter completes the required actions and responses of Enclosure 3 to Reference 1. This letter completes the Regulatory Commitment made in Enclosure 2 of Reference 3.

Enclosure 1 of this letter provides a licensing summary of the updated seismic walkdown report. Enclosure 2 of this letter contains the updated seismic walkdown report.

This letter contains no new NRC commitments. If you have any questions, please contact John Giddens at 205.992.7924.

Mr. C. R. Pierce states he is Regulatory Affairs 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.

Respectfully submitted,

C. R. Pierce

C. R. Pierce
Regulatory Affairs Director

CRP/CLN/lac

Sworn to and subscribed before me this 4th day of September, 2013.
Laura L. Crusto
Notary Public

My commission expires: 11-2-2013

- Enclosures: 1. Licensing Summary of Walkdown Report
2. Updated Farley Unit 2 Seismic Walkdown Report for Resolution of Fukushima Near-Term Task Force Recommendation 2.3: Seismic

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
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U. S. Nuclear Regulatory Commission
Mr. V. M. McCree, Regional Administrator
Mr. R. E. Martin, NRR Project Manager – Farley
Mr. P. K. Niebaum, Senior Resident – Farley
Mr. J. R. Sowa, Senior Resident – Farley

Alabama Department of Public Health
Dr. D. E. Williamson, State Health Officer

**Joseph M. Farley Nuclear Plant – Unit 2
Updated Seismic Recommendation 2.3 Walkdown Report Requested by
NRC Letter, *Request for Information Pursuant to Title 10 of the Code of
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of the Near-Term Task Force Review of Insights from
the Fukushima Daiichi Accident, dated March 12, 2012***

Enclosure 1

Licensing Summary of Walkdown Report

LICENSING SUMMARY OF WALKDOWN REPORT

The report objective is to document the results of the Seismic Walkdowns at the Joseph M. Farley Nuclear Plant (FNP) Unit 2 in response to the NRC 10 CFR 50.54(f) letter dated March 12, 2012, "Enclosure 3, Recommendation 2.3: Seismic". The scope of the walkdowns was to identify potentially degraded, unanalyzed, or nonconforming conditions relative to the seismic licensing basis. The Seismic Walkdowns followed the guidance contained in EPRI Report 1025286 (Reference 2), which was endorsed by the NRC on May 31, 2012. This final report submits the entire body of the report, Attachments 1, 2, 3, 5, and 6 (which are revised from Version 1 submitted November 27, 2012), and new Attachments 7 and 8 added by Version 2 of this report.

SNC submitted its original walkdown report for FNP Unit 2 on November 27, 2012, in accordance with the March 12, 2012, NRC 10 CFR 50.54(f) letter. During that initial walkdown, some equipment was identified as not being accessible, as noted in Table 7-1 of SNC's November 27, 2012, response. This inaccessible equipment could not be accessed because of one of two conditions: (1) plant operating conditions, or (2) component inspections required the opening of cabinet/panel doors which was not conducted, or not permitted by plant Operations personnel during the time of the walkdowns. Consequently, walkdowns had to be deferred until the outage. Additionally, supplemental guidance/clarification for opening cabinets to inspect for adverse seismic conditions was received after the FNP Unit 2 walkdowns were complete. Consequently, walkdown of equipment affected by this guidance was deferred until after SNC's November response and was included in Table 7-1 of the November 27, 2012, response. Walkdowns of this equipment along with the equipment originally deemed as inaccessible have been completed. Table 7-1 has been updated to show this equipment as complete with the completion date noted.

During the course of the seismic walkdowns, a total of 12 Unit 2 Potentially Adverse Conditions were identified and entered into the Corrective Action Program. Eight of these were identified and included in Version 1.0 of the FNP Seismic Walkdown Report while four were identified during the most recent walkdowns. It has been determined that none of these as-found conditions would prevent SSCs from performing their required safety functions as defined by Reference 2. Table 8-1 provides additional details on the SSCs that were identified during the walkdowns and entered into the CAP as degraded, nonconforming, or unanalyzed relative to their seismic licensing basis. This table has been updated to provide the status of these areas.

During the most recent walkdowns, two items were deemed inaccessible and were removed from the Seismic Walkdown Equipment List (SWEL) 1. Item 5 in Table 7-1 was not inspected due to its location (high in the overhead) and was deleted from SWEL 1. Additionally, Item 9 was deemed as inaccessible because a kick plate could not be removed to fully inspect welds of the cabinet to the floor structure. These changes to the SWEL are acceptable since an adequate number of similar component walkdowns that satisfy the minimum SWEL component types for this category were performed. The number of samples to be included in the SWEL as required by Reference 2 of this letter is still met.

In conclusion, the Seismic Walkdowns at FNP Unit 2 in response to the NRC 10 CFR 50.54(f) letter dated March 12, 2012, "Enclosure 3, Recommendation 2.3: Seismic" are complete as all items on the SWEL have been inspected. FNP Unit 2 had no significant degraded, nonconforming or unanalyzed conditions that warrant modification to the plant. FNP Unit 2 had no as-found conditions that would prevent SSCs from performing their required safety functions.