

Charles R. Pierce  
Regulatory Affairs Director

Southern Nuclear  
Operating Company, Inc.  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, AL 35242

Tel 205.992.7872  
Fax 205.992.7601



**SEP 15 2015**

Docket Nos.: 50-348  
50-364

NL-15-1665

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

Joseph M. Farley Nuclear Plant – Units 1 and 2  
Response to Request for Additional Information Regarding  
SNC License Amendment Request for TSTF-523, Revision 2

References:

1. SNC Letter NL-15-0421, *Joseph M. Farley Nuclear Plant – Units 1 and 2 License Amendment Request to Revise Technical Specifications Regarding Generic Letter 2008-01, Managing Gas Accumulation in accordance with TSTF-523, Revision 2, Using the Consolidated Line Item Improvement Process (CLIP), dated May 12, 2015.*
2. NRC Letter, *Joseph M. Farley Nuclear Plant, Units 1 and 2 – Request for Additional Information (TAC NOS. MF6211 AND MF6212), dated August 20, 2015.*

Ladies and Gentlemen:

On May 12, 2015, in accordance with the provisions of 10 CFR 50.90 Southern Nuclear Operating Company (SNC) submitted a request for an amendment to the technical specifications (TS) for Joseph M. Farley Nuclear Plant (FNP), Units 1 and 2 (Reference 1).

The proposed amendment would modify TS requirements related to Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray systems," as described in TSTF-523, Revision 2, "Generic Letter 2008-01, Managing Gas Accumulation."

Following the submittal of the FNP License Amendment Request, SNC received a request for additional information by the NRC on August 20, 2015 (Reference 2). Enclosure 1 provides the requested information. Enclosure 2 provides the replacement pages for the affected LAR FNP Technical Specification Marked Up Pages. Enclosure 3 provides the replacement pages for the affected LAR FNP Technical Specification Clean Typed Pages.

This letter contains no new NRC commitments. If you have any questions, please contact Ken McElroy at (205) 992-7369.

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  
Regulatory Affairs Director

CRP/GLS/lac

Sworn to and subscribed before me this 15 day of September, 2015.



Notary Public

My commission expires: 10-8-2017

Enclosures: 1. Response to Request for Additional Information – TSTF-523  
2. FNP Technical Specification Marked Up Replacement Pages  
3. FNP Technical Specification Clean Typed Replacement Pages

cc: Southern Nuclear Operating Company  
Mr. S. E. Kuczynski, Chairman, President & CEO  
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer  
Mr. M. D. Meier, Vice President – Regulatory Affairs  
Ms. C. A. Gayheart, Vice President – Farley  
Mr. D. R. Madison, Vice President – Fleet Operations  
Mr. B. J. Adams, Vice President – Engineering  
Ms. B. L. Taylor, Regulatory Affairs Manager – Farley  
RType: CFA04.054

U. S. Nuclear Regulatory Commission  
Mr. V. M. McCree, Regional Administrator  
Mr. L. D. Wert, Regional Administrator (Acting)  
Mr. S. A. Williams, NRR Project Manager – Farley  
Mr. P. K. Niebaum, Senior Resident Inspector – Farley

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



**Joseph M. Farley Nuclear Plant – Units 1 and 2  
Response to Request for Additional Information Regarding  
SNC License Amendment Request for TSTF-523, Revision 2**

**Enclosure 1**

**Response to Request for Additional Information – TSTF-523**

The NRC staff has reviewed the Joseph M. Farley Nuclear Plant, Units 1 and 2 license amendment request and determined that additional information is necessary as noted below.

**RAI No. 1**

TSTF-523, Revision 2, has been approved by the NRC, and the licensee stated in their submittal that the proposed amendment was consistent with TSTF-523, Revision 2. In Enclosure 2 of the submittal, new Surveillance Requirements 3.4.8.3 and 3.9.5.3 use the phrase "Verify required RHR loop locations ..." versus the approved TSTF verbiage, "Verify RHR loop locations...." The wording in the submittal is inconsistent with TSTF-523 and Limiting Conditions for Operation (LCOs) 3.4.8 and 3.9.5, which specify that two RHR loops shall be OPERABLE. TSTF-523 uses the qualifier "required" in the surveillance language when the associated LCO calls for only one RHR loop to be operable.

Please revise the submittal to use language that is consistent with the approved traveler and LCOs 3.4.8 and 3.9.5 or provide a technical justification for the deviation.

**SNC Response to RA1:**

The new Surveillance Requirements (SR's) 3.4.8.3 and 3.9.5.3 will remove the word "required" to ensure consistency with TSTF-523, Revision 2. The SR's will now use the approved verbiage "Verify RHR loop locations susceptible to gas accumulation are sufficiently filled with water." Enclosure 2 will include the pages to replace in the LAR for FNP Technical Specification Marked Up Pages sent in the original SNC letter NL-15-0421. Enclosure 3 will include the pages to replace in the LAR for the FNP Technical Specification Clean Typed Pages sent in the original SNC letter NL-15-0421. This change ensures that the proposed amendment is now consistent with TSTF-523, Revision 2.

**Joseph M. Farley Nuclear Plant – Units 1 and 2  
Response to Request for Additional Information Regarding  
SNC License Amendment Request for TSTF-523, Revision 2**

**Enclosure 2**

**FNP Technical Specification Marked Up Replacement Pages**

**ACTIONS**

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required RHR loops inoperable.  <u>OR</u>  No RHR loop in operation.	B.1 Suspend all operations involving reduction in RCS boron concentration.	Immediately
	<u>AND</u>  B.2 Initiate action to restore one RHR loop to OPERABLE status and operation.	Immediately

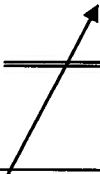
**SURVEILLANCE REQUIREMENTS**

SURVEILLANCE		FREQUENCY
SR 3.4.8.1	Verify one RHR loop is in operation.	In accordance with the Surveillance Frequency Control Program
SR 3.4.8.2	Verify correct breaker alignment and indicated power are available to the required RHR pump that is not in operation.	In accordance with the Surveillance Frequency Control Program

SR 3.4.8.3	Verify RHR loop locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program
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**SURVEILLANCE REQUIREMENTS**

SURVEILLANCE		FREQUENCY
SR 3.9.5.1	Verify one RHR loop is in operation and circulating reactor coolant at a flow rate of $\geq 3000$ gpm.	In accordance with the Surveillance Frequency Control Program
SR 3.9.5.2	Verify correct breaker alignment and indicated power available to the required RHR pump that is not in operation.	In accordance with the Surveillance Frequency Control Program



SR 3.9.5.3	Verify RHR loop locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program
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**Joseph M. Farley Nuclear Plant – Units 1 and 2  
Response to Request for Additional Information Regarding  
SNC License Amendment Request for TSTF-523, Revision 2**

**Enclosure 3**

**FNP Technical Specification Clean Typed Replacement Pages**



**ACTIONS**

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B. Required RHR loops inoperable.  <u>OR</u>  No RHR loop in operation.	B.1 Suspend all operations involving reduction in RCS boron concentration.	Immediately
	<u>AND</u>  B.2 Initiate action to restore one RHR loop to OPERABLE status and operation.	Immediately

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SR 3.4.8.2      Verify correct breaker alignment and indicated power are available to the required RHR pump that is not in operation.	In accordance with the Surveillance Frequency Control Program
SR 3.4.8.3      Verify RHR loop locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

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SR 3.9.5.2	Verify correct breaker alignment and indicated power available to the required RHR pump that is not in operation.	In accordance with the Surveillance Frequency Control Program
SR 3.9.5.3	Verify RHR loop locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program