



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

October 29, 2015

Mr. C. R. Pierce
Regulatory Affairs Director
Southern Nuclear Operating Company, Inc.
P. O. Box 1295/Bin - 038
Birmingham, AL 35201-1295

SUBJECT: JOSEPH M. FARLEY, UNITS 1 AND 2, AND VOGTLE, UNITS 1 AND 2 –
REQUEST FOR ADDITIONAL INFORMATION (CAC NOS. MF6211, MF6212,
MF6213, AND MF6214)

Dear Mr. Pierce:

By two letters dated May 12, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML15132A722 and ML15132A662), the Southern Nuclear Operating Company, Inc. (SNC), submitted a request to revise the Joseph M. Farley Nuclear Plant, Unit 1 and Unit 2, and the Vogtle Electric Generating Plant, Unit 1 and Unit 2, Technical Specifications consistent with the U.S. Nuclear Regulatory Commission (NRC)-approved Technical Specification Task Force Traveler 523, Revision 2, "Generic Letter 2008-01, Managing Gas Accumulation."

The NRC staff has determined that additional information is needed as discussed in the Enclosure. We request that SNC respond within 30 days of the date of this letter. Please note that the NRC staff's review is continuing and further requests for information may be developed.

If you have any questions, please contact me at (301) 415-1009.

Sincerely,

A handwritten signature in cursive script that reads "Shawn Williams".

Shawn Williams, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos.: 50-348, 50-364, 50-424, 50-425

cc: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

LICENSE AMENDMENT TO REVISE TECHNICAL SPECIFICATIONS

ADOPTION OF TSTF-523, REVISION 2

JOSEPH M. FARLEY NUCLEAR PLANT, UNIT 1 AND UNIT 2

VOGTLE ELECTRIC GENERATING PLANT, UNIT 1 AND UNIT 2

SOUTHERN NUCLEAR OPERATING COMPANY, INC.

DOCKET NOS. 50-348, 50-364, 50-424, 50-425

By two letters dated May 12, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML15132A722 and ML15132A662), the Southern Nuclear Operating Company, Inc. (SNC), submitted a request to revise the Joseph M. Farley Nuclear Plant, Unit 1 and Unit 2, and the Vogtle Electric Generating Plant, Unit 1 and Unit 2, Technical Specifications (TS) consistent with the U.S. Nuclear Regulatory Commission (NRC)-approved Technical Specification Task Force (TSTF) Traveler 523, Revision 2, "Generic Letter 2008-01, Managing Gas Accumulation."

As part of section 50.36 of Title 10 of the *Code of Federal Regulations* (10 CFR), "Technical Specifications," the licensee is required to provide a "summary statement of the bases or reasons for such specifications" as part of the license amendment request (LAR) submittal. Since the TS bases are part of the LAR submittal, they are utilized as supporting information by the NRC staff during the review of the TS changes. The U.S. Nuclear Regulatory Commission staff has determined that additional information regarding the TS bases is necessary since the application deviated from the approved language in TSTF-523.

RAI No. 1

In multiple sections of the TS bases associated with the Residual Heat Removal (RHR) system (Vogtle 3.4.6, 3.4.7, 3.4.8, 3.9.5, 3.9.6 and Farley 3.4.6, 3.4.7, 3.4.8, 3.9.4, 3.9.5) the TS bases state, "When the RHR System is restored to service, the surveillance is met by virtue of the performance of operating procedures that ensure the RHR Loop is adequately filled and vented. The performance of these manual actions ensures that the surveillance is met." According to the surveillance requirement (SR) language, the SR is met by ensuring the system is "sufficiently filled with water," but this TS bases description indicates that performance of operating procedures satisfies the SR. Please justify how "by virtue of the performance of operating procedures" ensures that the SR acceptance criteria are met for locations susceptible to gas accumulation or, if necessary, revise the TS bases so that they are in agreement with the approved TSTF-523 language.

Enclosure

RAI No. 2

In multiple sections associated with the RHR system (Vogtle 3.4.6, 3.4.7, 3.4.8, 3.9.5, 3.9.6 and Farley 3.4.6, 3.4.7, 3.4.8, 3.9.4, 3.9.5) the TS bases state, "SR may be met for a RHR Loop by virtue of having a loop in service in accordance with operating procedures." If the system is running with sufficient flow, monitoring the running parameters is effective. However, if the flow is low, the gas voids may not transport through the system. Additionally, stagnant branch lines in an operating system may be susceptible to gas accumulation. This appears to be an alternative to performing the SR. Please explain how the flowrate of the operating system and the stagnant branch lines are taken into consideration when crediting the in-service loop as meeting the SR. Explain why is it acceptable to describe this approach in the TS bases rather than the TS surveillance. If necessary, revise the TS bases so that they are in agreement with the approved TSTF-523 language.

RAI No. 3

In multiple sections associated with the RHR system (i.e., Vogtle - 3.4.6, 3.4.7, 3.4.8, 3.9.5, 3.9.6, and Farley - 3.4.6, 3.4.7, 3.4.8, 3.9.4, 3.9.5), the TS bases state, "The RHR system is assumed to remain sufficiently filled with water and may be restarted following short term duration RHR shutdowns, if no evolutions were performed that can introduce voids into the RHR loop." This language is not contained in TSTF-523, so please explain how short-term duration is determined by the operators along with its basis. Also, if necessary, revise the TS bases so that they are in agreement with the approved TSTF-523 language.

October 29, 2015

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/RA/

Shawn Williams, Senior Project Manager
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Docket Nos.: 50-348, 50-364, 50-424, 50-425

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ADAMS Accession No.: ML15300A457

OFFICE	NRR/LPLII-1/PM	NRR/LPLII-1/LA	NRR/LPLII-1/PM	NRR/LPLII-1/BC	NRR/LPLII-1/PM
NAME	SWilliams	SFiguroa	BMartin	RPascarelli	SWilliams
DATE	10/28/15	10/28/15	10/28/15	10/28/15	10/29/15

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