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50-364

NL-16-0572

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

Joseph M. Farley Nuclear Plant

Response to Request for Additional Information Regarding TSTF-432-A, Rev. 1

Ladies and Gentlemen:

By letter dated April 13, 2015, Southern Nuclear Operating Company (SNC) submitted a request to revise the Joseph M. Farley (FNP) Units 1 and 2 Technical Specifications (TS) to adopt TSTF-432-A, Revision 1, "Change in Technical Specification End States, WCAP-16294". By letter dated April 7, 2016, the Nuclear Regulatory Commission (NRC) sent a Request for Additional Information (RAI). Enclosure 1 provides the SNC response to the NRC RAI. Enclosure 2 provides the revised TS Bases page resulting from the RAI.

This letter contains no 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 for 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/RMJ

Sworn to and subscribed before me this 13th day of APRIL, 2016.

Notary Public

My commission expires: 10-8-2017



Enclosures: 1. Response to NRC RAI
2. Revised TS Bases Page

cc: Southern Nuclear Operating Company
Mr. S. E. Kuczynski, Chairman, President & CEO
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer
Ms. C. A. Gayheart, Vice President – Farley
Mr. M. D. Meier, Vice President – Regulatory Affairs
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
Ms. C. Haney, Regional Administrator
Mr. S. A. Williams, NRR Project Manager - Farley
Mr. P. K. Niebaum, Senior Resident Inspector - Farley

Alabama Department of Public Health
Dr. T. M. Miller, MD, State Health Officer

**Joseph M. Farley Nuclear Plant
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Rev. 1**

Enclosure 1

Response to NRC RAI

NRC RAI

As required by section 50.36 of Title 10 of the Code of Federal Regulations (10 CFR 50.36), "Technical Specifications," the licensee must provide a summary statement of the bases or reasons for such specifications as part of the LAR submittal. This information may be reviewed for consistency with the associated TS changes. Based on the above, please explain the discrepancies between the TS changes and TS bases that were submitted:

- The Bases discussion for Required Action D.1 and D.2 from TS 3.8.4 still includes a Mode 5 end state reference

SNC Response to NRC RAI

This sentence in question should have been deleted when FNP submitted to adopt this TSTF Traveler. Enclosure 2 provides the revised TS Bases markup with this sentence deleted. (Please note that it's Required Actions C.1 and C.2 from TS Bases 3.8.4 that contains the erroneous sentence, not Required Actions D.1 and D.2.)

**Joseph M. Farley Nuclear Plant
Response to Request for Additional Information Regarding TSTF-432-A,
Rev. 1**

Enclosure 2

Revised TS Bases Page

BASES

ACTIONS
(continued)

B.1 and D.1

Conditions B and D represent one Auxiliary Building or SWIS DC electrical power subsystem with connection resistance not within the specified limit. Consistent with the guidance in IEEE-450, connection resistance not within the limit is an indication that the affected battery requires attention to restore the resistance to within the limit but is not a basis on which to declare the battery inoperable. Therefore, the 24 hour Completion Time allowed to restore the battery connection resistance to within the required limit is a reasonable time considering that variations in connection resistance do not mean the battery is incapable of performing its required safety function, but is an indication that the battery requires maintenance.

C.1 and C.2

If the inoperable Auxiliary Building DC electrical power subsystem cannot be restored to OPERABLE status or the connection resistance restored to within the limit within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems. The Completion Time to bring the unit to MODE 5 is consistent with the time required in Regulatory Guide 1.93 (Ref. 8).

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overall plant risk is reduced.

INSERT - BASES 3.8.4 Condition C

E.1

If a required SWIS DC electrical power subsystem is inoperable or the connection resistance is not restored to within the limit and the associated Completion Time has expired, the Service Water System train supported by the affected SWIS DC electrical power subsystem must be declared inoperable. The capability of the affected SWIS DC electrical power subsystem to fully support the associated train of Service Water is not assured. Therefore, consistent with the definition of OPERABILITY, the associated train of Service Water must be declared inoperable immediately, thereby limiting operation in this condition to the Completion Time associated with the affected Service Water System train.

(continued)