



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

March 7, 2019

LICENSEE: Southern Nuclear Operating Company, Inc.

FACILITY: Joseph M. Farley Nuclear Plant, Units 1 and 2

SUBJECT: JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2 (FNP) – MARCH 5, 2019, MEETING SUMMARY REGARDING PRE-APPLICATION MEETING TO DISCUSS PROPOSED AMENDMENT TO REVISE TECHNICAL SPECIFICATION 3.3.1 AND 3.3.2 (EPID L-2019-LRM-0010)

On March 5, 2019, an open Category 1 public teleconference call was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Southern Nuclear Operating Company, Inc. (SNC) at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland. This was a pre-application conference call to discuss a proposed license amendment request (LAR) related to Technical Specification (TS) 3.3.1 and 3.3.2 regarding backup reactor trip and engineered safety feature actuation instrumentation.

The meeting was noticed on February 19, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19050A445). A list of participants is provided in Enclosure 1. SNC provided presentation slides prior to the meeting (ADAMS Accession No. ML19057A476).

Public Conference Call

During the call, SNC followed the presentation. SNC is proposing to add Action statements to TS 3.3.1, "RTS [reactor trip system] Instrumentation," and TS 3.3.2, "ESFAS [engineered safety feature actuation system] Instrumentation," for 7 backup Instrument Functions (Functions) that would allow 72 hours to restore channels to Operable status when multiple channels are inoperable. The licensee explained the purpose of the LAR is that the current RTS and ESFAS instrumentation TS actions require application of Limiting Condition of Operation (LCO) 3.0.3 which does not provide sufficient time to troubleshoot and repair the inoperable channels. SNC asserted that a unit shutdown under this condition for backup instrumentation is considered overly restrictive because a reactor trip or ESFAS initiation on these backup instrument functions is not credited as a primary trip or initiation function in the FNP accident or transient analysis. SNC cited November 7, 2018, FNP, Units 1 and 2, license amendment (ADAMS Accession No. ML18271A207) as a precedent, where NRC approved the Function "High Steam Flow in Two Steam Lines" to allow 48 hours to restore channels to Operable status when multiple channels are inoperable. The licensee asserted that it would be an improvement in safety by allowing 72 hours to troubleshoot and repair the inoperable channels versus requiring a reactor shutdown per LCO 3.0.3.

The NRC staff discussed the following with SNC:

1. NRC staff noted that the November 7, 2018, license amendment referenced as a precedent that approved one Function for 48 hours with multiple channels to be inoperable, was not

approved solely on the bases that it was not credited in any accident or transient specified in Chapter 15 of the FNP Updated Final Safety Analysis Report (UFSAR).

The current proposal requesting 7 additional Functions to allow 72 hours for multiple channels inoperable is a first-of-a-kind request that is not consistent with NUREG-1431, Volume 1, "Standard Technical Specifications Westinghouse Plants."

2. Address each of the 7 proposed RPS and ESFAS Functions separately by:
 - a. referencing the specific location in the licensing bases that demonstrates the proposed Function is a backup Function and not credited in any accident or transient analyses in the UFSAR.
 - b. including a Function-specific justification and any operational hardship.
 - c. including a Function-specific justification for the proposed 72 hours.
3. In addition to the Function-specific justification, include a combined Non-Significant Hazard Determination justification explaining how the proposed change does not increase the probability of consequences or involve a significant reduction in a margin of safety when all 7 proposed Functions can have all channels inoperable for the same 72 hour period.
4. Consider risk informed information and an explanation of any changes to the risk profile.
5. Include any compensatory measures or defense-in-depth features that provide a level of protection during the 72 hours.

No regulatory decisions or commitments were made during the meeting. No members of the public participated.



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

Docket Nos. 50-348 and 50-364

Enclosure:
List of Attendees

cc: Listserv

LIST OF ATTENDEES

MARCH 5, 2019, PRE-APPLICATION TELECONFERENCE CALL WITH

SOUTHERN NUCLEAR OPERATING COMPANY

JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2

TECHNICAL SPECIFICATION 3.3.1 AND 3.3.2

U.S. Nuclear Regulatory Commission Staff

Shawn Williams
Michael Markley
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Steve Jones

Southern Nuclear Operating Company, Inc. Participants

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