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Southern Nuclear Operating Company
the southern electric system

J. D. Woodard
Vice President
Farley Project

January 31, 1992

Docket Nos. 50-348
50-364

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

Joseph M. Farley Nuclear Plant - Units 1 and 2
NRC Bulletin No. 88-11
Pressurizer Surge Line Thermal Stratification

Gentlemen:

By letter dated December 30, 1991, Southern Nuclear Operating Company (SNC) provided a clarification to the Nuclear Regulatory Commission (NRC) regarding SNC's efforts relating to NRC Bulletin 80-11, "Pressurizer Surge Line Thermal Stratification." In this letter several statements were made by SNC under the name "Alabama Power Company." As of December 23, 1991, SNC became the licensed operator of Farley Nuclear Plant. Below is the full text of the December 30, 1991, letter which has been corrected to reflect SNC as the responsible organization for operational obligations with regard to the generic letter actions.

By letters dated January 31, 1991, Alabama Power Company submitted the results of the stress and fatigue analysis required by the subject bulletin for both units and a justification for continued operation (JCO) for Unit 2. Nuclear Regulatory Commission (NRC) letter dated August 21, 1991, acknowledged receipt of that response and indicated that both units had satisfied the requirements of Bulletin 88-11. This letter also indicated that the JCO submitted for Unit 2 is acceptable until such time as the leak-before-break (LBB) analysis review is completed by the NRC. This implies that the JCO acceptance is linked to the review of the LBB analysis. SNC wishes to clarify that the JCO on Unit 2 is not dependent on the approval of the LBB analysis. As stated in the JCO and restated in the NRC letter, a procedural change has been implemented to limit the system delta T to less than 310°F which will maintain the pipe stresses within the code allowable. This conclusion is not based upon the LBB analysis. Although it is SNC's intent to remove the pipe whip restraints whenever the LBB analysis is approved, the JCO would remain valid without the removal of the whip restraints.

The NRC letter requested that they be informed when all modifications to Unit 2 have been accomplished. Notification will be made when SNC has completed the modifications to the restraints. The design is currently developed to the point that NRC approval is needed on the LBB analysis prior to proceeding. If there are any questions, please advise.

Respectfully submitted,

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