Bouthern Nuclear Operating Company Pols Office Box 1285 Birmingham, Alabama 35201 Telephone 205 865 5666



Southern Nuclear Operating Company

J. D. Woodard Vice President Farley Project

March 27, 1992

he southern electric system

Docket No. 50-364

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

> Joseph M. Farley Nuclear Plant - Unit 2 Interim Plugging Criteria

### Gentlemen:

In a telephone conversation on March 23, 1992, the Farley NRC Staff Project Manager requested that Southern Nuclear Operating Company (Southern Nuclear) undertake four actions which had previously been discussed with the Staff. The NRC requests and Southern Nuclear's positions are provided below.

1. NKC Request

The licensee's eddy current test guidelines (Attachment 7 to letter dated February 7, 1992) shall be revised to require that all flaw indications (as defined in Section A.3.1 of Appendix A to WCAP-12871, Revision 2) be recorded, regardless of voltage amplitude.

# Southern Nuclear Position

Southern Nuclear will record all flaw indications regardless of voltage amplitude.

2. NRC Request

RPC flaw indications not found by the bobbin due to masking effects (due to denting, artifact indications, noise) shall be plugged or repaired. Tubes with greater than 5.0 volt dents (as measured with the bobbin) shall be plugged or repaired if they are found to exhibit RPC flaw indications.

# Southern Nuclear Position

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7203310214 720327 PDR ADDCK 05000364 3. NRC Request

The licensee shall inform the Staff, prior to Cycle 9 operation, of any unexpected inspection findings relative to the assumed characteristics of the flaws at the TSPs. This includes any detectable circumferential indications or detectable indications extending outside of the TSP thickness. The licensee's safety evaluation of these unexpected findings shall also be provided.

#### Southern Nuclear Position

Southern Nuclear will inform the NRC, prior to Cycle 9 operation, of any unexpected inspection findings relative to the assumed characteristics of the flaws at the TSPs. This includes any detectable circumferential indications or detectable indications outside the TSP thickness. Any applicable safety evaluations for unexpected findings will be provided to the NRC.

4. NRC Request

The Staff's approval of the proposed interim repair limit is contingent on the licensee's being able to demonstrate that acceptance of all indications satisfying the 1.0 volt criterion will not create potential for leakage in excess of the 1.0 gpm licensing basis for a postulated SLB occurring at EOC 9. The licensee is requested to submit the results of the SLB leakage analysis prior to restart from the eighth refueling outage.

#### Southern Nuclear Position

The predicted SLR Teakage will be reported to the Staff prior to restart from the eighth refueling outage for Unit 2. Southern Muclear understands and accepts that the Staff's approval of the interim repair limit is contingent on the demonstration that the predicted SLB Teakage at EOC 9 will not exceed 1 gpm.

The above positions are applicable only to the Unit 2 ninth operating cycle upon approval of the interim plugging criteria.

In addition to the above, revised Technical Specification pages to correct editorial errors in pages 3/4 4-17 and B3/4 4-3a submitted by Southern Nuclear letter dated February 20, 1992 are attached. The changes to these pages restore existing wording to portions of the pages which were not revised in support of the interim plugging criteria. These changes have no impact on the significant hazards evaluation included with Southern Nuclear's February 20, 1992 letter. U S. Nuclear Regulatory Commission

If there are any questions, please advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

for alm All

J. D. Woodard

SWORN TO AND SUBSCRIBEU BEFORE ME THIS 27 DAY OF March, 199? Notary Agence My commission Expires: 8-24-92

JDW/REM:map

Attachment

cc: Mr. S. D. Ebneter Mr. S. T. Hoffman Mr. G. F. Maxwell