

NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

September 17, 1992

Docket Nos. 50-348 and 50-364

> Mr. W. G. Hairston, III Executive Vice President Southern Nuclear Operating Company, Inc. Post Office Box 1295 Birmingham, Alabama 35201-1295

Dear Mr. Hairston:

SUBJECT: RELIEF REQUESTS FOR THE INSERVICE TESTING PROGRAM FOR PUMPS AND VALVES AT THE JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2 (TAC NOS. M81197, M81198, M82251, AND M82252)

This letter provides the results of the Nuclear Regulatory Commission (NRC) staff's review of the information provided by your letters dated July 26, 1991, July 29, 1991, December 3, 1991, December 30, 1991 (2 letters), and April 10, 1992 (2 letters), concerning the relief requests for Joseph M. Harley Nuclear Plant (Farley), Units 1 and 2, inservice testing (IST) program for pumps and valves. Your submittals included responses to the IST program action items that were identified in the staff's Safety Evaluation (SE) issued by letter dated May 23, 1991, and to the staff's request for additional information contained in a letter dated February 14, 1992. The Februa y 14, 1992, letter also granted interim relief for certain relief requests until the date of issuance of the enclosed SE.

Title 10 of the Code of Federal Regulations, Section 50.55a, requires that inservice testing of certain American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 pumps and valves be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda, except where specific written relief has been requested by the licensee and granted by the NRC pursuant to Sections (a)(3)(i), (a)(3)(ii), or (g)(6)(i) of 10 CFR 50.55a. Guidance on acceptable alternatives to Section XI requirements for certain aspects of IST was provided by the NRC in Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs."

The NRC staff with technical assistance from Brookhaven National Laboratory (BNL) has reviewed your requests for relief concerning the Fariey, Units 1 and 2, IST programs. The staff adopts the evaluations and conclusions contained in BNL's Technical Evaluation Report (TER), "Pump and Valve Inservice Testing Program, Farley Nuclear Power Plant, Units 1 and 2, Southern Nuclear Operating Company." The enclosed SE incorporates the TER which is an attachment to the SE.

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The staff is granting relief from certain testing requirements, which we have determined would be impractical to perform, where compliance would result in a hardship without a compensating increase in safety, or where the proposed alternative testing provides an acceptable level of quality and safety. A summary of the staff's actions is provided in Table 1 of the SE. For relief requests that have been denied, your testing should comply with the applicable Section XI requirements and GL 89-04 guidelines within 3 months of the date of this letter. Regarding the relief requests that have been denied, any additional information supporting the relief requested should be submitted in a revised relief request within 3 months of the date of this letter.

Except for the denied relief requests, the IST program relief requests for Farley, Units 1 and 2, provided by the July 26, 1991, July 29, 1991, December 3, 1991, December 30, 1991, and April 10, 1992, submittals are acceptable for implementation provided (1) the action items identified in Section 5 of the TER are addressed within one year of the date of this letter and (2) the procedural or program changes covered in Section 5 of the TER are completed within one year of the date of this letter, by the end of the next refueling outage, or by the schedule specified in an individual action item, whichever is later. The granting of relief is based upon the fulfillment of any commitments made by you in your basis for each relief request and the alternatives proposed.

Program changes involving new or revised relief requests should not be implemented prior to approval by the NRC. New or revised relief requests that meet the positions in GL 89-04, Attachment 1, should be submitted to the NRC, but can be implemented provided the guidance in GL 89-04, Section D. is followed. Program changes that add or delete components from the IST program should also be provided to the NRC.

The staff reviews performed to support the enclosed SE and the SE issued by letter dated May 23, 1991, did not include verification that all pumps and valves within the scope of 10 CFR 50.55a and Section XI are contained in the IST program. Additionally, for the components included in the IST program, no determination was made to ensure all applicalle testing requirements were identified. Therefore, you are requested _ provide the NRC with a description of the process used in developing the IST program. The submittal should include, as a minimum, details of the documents used, the method of determining if a component requires inservice testing, the basis for the testing required, the basis for categorizing valves, and the method or process used for maintaining the program current with design modifications or other activities performed under 10 CFR 50.59. If a description of this process is not already available from existing documentation, the staff envisions that this request could be answered in 2 to 4 pages. It could be incorporated into the IST program in appropriate sections. This information should be provided within one year of the date of this letter.

Mr. W. S. Hairston, III

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This letter completes the NRC staff's review of your IST submittals and TAC Numbers M81197, M81198, M82251, and M82252 are closed.

Sincerely,

Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure: Safety Evaluation

cc w/enclosure: See next page

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Document Name: FAR81197.LTR

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