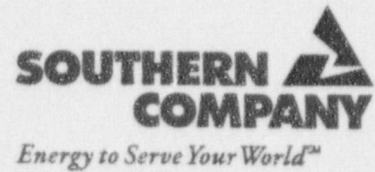


Dave Morey
Vice President
Farley Project

Southern Nuclear
Operating Company
P.O. Box 1295
Birmingham, Alabama 35201
Tel 205.992.5131



October 12, 1998

Docket Numbers: 50-348
50-364

10 CFR 50.90

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

Joseph M. Farley Nuclear Plant
Technical Specification Change Request For
Steam Generator Replacement Project - Administrative Controls

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) proposes to amend the Farley Nuclear Plant (FNP) Unit 1 and Unit 2 Technical Specifications (TS), Appendix A to Operating Licenses NPF-2 and NPF-8. This TS change request will revise Section 6, "Administrative Controls," of the current Farley Unit 1 and Unit 2 TS. The proposed change consists of the recognition of additional management positions associated with the steam generator replacement project and providing them the ability to approve procedures regarding this project which may affect nuclear safety. //

The required information for the proposed change is provided in the attachments to this letter. Attachment 1 is the basis for the proposed change. The supporting significant hazards evaluation pursuant to 10 CFR 50.91 is provided in Attachment 2. Based upon the analysis provided, SNC has determined that the proposed changes to the TS do not involve a significant hazards consideration as defined by 10 CFR 50.92. SNC has also determined that the proposed changes will not significantly affect the quality of the human environment. Attachment 3 includes the changed TS pages list, the marked-up changed TS pages, and the revised TS pages. The TS pages provided are in the current format. The Improved Technical Specifications proposed amendment will move this information to the FSAR. Any revisions to the Farley Final Safety Analysis Report (FSAR) required as a result of this change will be made in accordance with 10 CFR 50.71(e). 4001

The Plant Operations Review Committee and the Nuclear Operations Review Board has reviewed and approved this proposed change. Due to the nature of this proposed administrative change, NRC approval is requested as soon as possible but no later than by April 1999. This request is necessary to prevent a delay in implementing the steam generator replacement programs.

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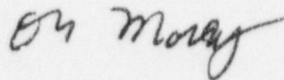
A copy of the proposed changes has been sent to Dr. D. E. Williamson, the Alabama State Designee, in accordance with 10 CFR 50.91(b)(i).

Mr. D. N. Morey states that he is a Vice President of Southern Nuclear Operating Company and is authorized to execute this oath on behalf of Southern Nuclear Operating Company and that, to the best of his knowledge and belief, the facts set forth in this letter and enclosures are true.

If you have any questions, please advise.

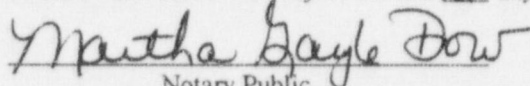
Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Dave Morey

Sworn to and subscribed before me this 12th day of Oct. 1998.


Notary Public

My Commission Expires: November 1, 2001

JMG/CHM/clt:managers.doc

- Attachments: 1 Description of Proposed Amendment
2 Significant Hazards Evaluation
3 Technical Specification Changed Pages

cc: Mr. L. A. Reyes, Region II Administrator
Mr. J. I. Zimmerman, NRR Project Manager
Mr. T. P. Johnson, Plant Sr. Resident Inspector
Dr. D. E. Williamson, Alabama State Department of Public Health

Attachment 1

**Joseph M. Farley Nuclear Plant
Technical Specification Change Request For
Steam Generator Replacement Project - Administrative Controls**

Basis for Proposed Change

Joseph M. Farley Nuclear Plant
Technical Specification Change Request For
Steam Generator Replacement Project - Administrative Controls

Basis for Proposed Change

During 1997 Southern Nuclear Operating Company (SNC), as operator of the Joseph M. Farley Nuclear Plant (FNP), recommended to the owner of the facility, Alabama Power Company, that the steam generators be replaced. Alabama Power Company approved this recommendation, and SNC put together a management team to ensure project completion. The Steam Generator Replacement Project is composed of a project manager and other management and staff currently located at the SNC corporate headquarters in Birmingham, Alabama as well as on site at FNP. The steam generator replacement project organization has multiple reporting relationships, but reports to the General Manager – Nuclear Plant, as members of the plant staff, pursuant to that position's responsibilities for the overall unit's operation (TS 6.1.1). To facilitate an appropriate level of review and approval of the procedures necessary to conduct this activity without impacting the current operational attention of the on-site plant management, SNC is proposing to revise the list of managers that may approve procedures which may affect plant nuclear safety to include the steam generator replacement project managers.

The change is administrative in nature. This proposed change will have no impact on the current operation of the FNP. Only pages in Section 6.0, "Administrative Controls," are proposed to be changed.

Attachment 2

**Joseph M. Farley Nuclear Plant
Technical Specification Change Request For
Steam Generator Replacement Project - Administrative Controls**

Significant Hazards Evaluation

Joseph M. Farley Nuclear Plant
Technical Specification Change Request For
Steam Generator Replacement Project - Administrative Controls

Significant Hazards Evaluation

PROPOSED CHANGE:

The proposed change to the Joseph M. Farley Nuclear Plant (FNP) Technical Specifications (TS) reflects only changes to administrative controls. The change will revise the list of managers that can approve procedures which may affect plant nuclear safety.

BACKGROUND:

The Steam Generator Replacement (SGR) Project is composed of a project management and staff currently located at the SNC corporate headquarters in Birmingham, Alabama as well as on site at FNP. To facilitate an appropriate level of review and approval of the procedures necessary to conduct this activity without impacting the current operational attention of the on-site plant management, SNC is proposing to add the steam generator replacement managers to the appropriate TS list. The specific positions being added to the TS list are the SGR Project Manager, SGR Engineering Manager, SGR Installation Manager, SGR Quality Manager, and SGR Project Controls Manager.

This proposed change will have no impact on the current operation of FNP. Only pages in Section 6.0, "Administrative Controls," are proposed to be revised.

ANALYSIS:

Southern Nuclear Operating Company has reviewed the requirements of 10 CFR 50.92 as they relate to the identified proposed change to the FNP TS and considers this change not to involve a significant hazards consideration. In support of this conclusion, the following analysis is provided:

- (1) The proposed changes do not significantly increase the probability or consequences of an accident previously evaluated in the FSAR. The proposed changes have no impact on the probability of an accident. The change being proposed is administrative in nature and involves no physical alteration of the plant or changes to setpoints or operating parameters. The change will provide an appropriate level of review and approval of procedures related to the FNP steam generator replacement without impacting the operational attention of the current on-site plant management. There is no change in the FNP design basis as a result of this change and, as a result, does not involve a significant increase in the consequences of an accident previously evaluated.

Joseph M. Farley Nuclear Plant
Technical Specification Change Request For
Steam Generator Replacement Project - Administrative Controls
Significant Hazards Evaluation

- (2) The proposed changes to the TS do not increase the possibility of a new or different kind of accident than any accident already evaluated in the FSAR. No new limiting single failure or accident scenario has been created or identified due to the proposed changes. Safety-related systems will continue to perform as designed. The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.
- (3) The proposed changes do not involve a significant reduction in the margin of safety. Adding individuals with the appropriate knowledge base to the list of individuals who can approve procedures, which may affect plant nuclear safety, is administrative in nature. There is no impact on the accident analyses. The training and experience requirements for the newly designated management positions are similar to those requirements for other FNP management positions. Therefore the established level of procedure review and approval is not adversely impacted. In addition, these changes allow FNP management to remain focused on plant operations. Thus the proposed changes do not involve a significant reduction in the margin of safety.

CONCLUSION:

Based upon the analysis provided herein, Southern Nuclear Operating Company has determined that the proposed changes to the FNP TS will not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in the margin of safety. Therefore, Southern Nuclear Operating Company has determined that the proposed changes meet the requirements of 10 CFR 50.92(c) and do not involve a significant hazards consideration.

Attachment 3

Joseph M. Farley Nuclear Plant Technical Specification Change Request For Steam Generator Replacement Project - Administrative Controls

Technical Specification Pages

Technical Specifications Pages for Unit 1 – Changed Pages List

Technical Specifications Pages for Unit 1 – Marked-up Pages

Technical Specifications Pages for Unit 1 – Typed Pages

Technical Specifications Pages for Unit 2 – Changed Pages List

Technical Specifications Pages for Unit 2 – Marked-up Pages

Technical Specifications Pages for Unit 2 – Typed Pages