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Docket Nos.: 50-348  
50-364

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

Joseph M. Farley Nuclear Plant  
Review of Turbine Driven Auxiliary Feedwater in Reference To  
Tornado Missile Risk Analysis

Ladies and Gentlemen:

SNC staff has reviewed your letter dated August 12, 1998. The letter agreed with the Farley staff position that the turbine driven auxiliary feedwater (TDAFW) pump turbine exhaust stack is not required to be protected from tornado generated missiles. We are concerned, however, that the NRC staff does not understand our design and licensing basis with regard to postulation of a single active failure in conjunction with consequential failure resulting from a design basis tornado. FNP is not committed to the requirements of Regulatory Guide (RG) 1.117 "Tornado Design Classification." We are committed to RG 1.76 "Design Basis Tornado for Nuclear Power Plants". This RG does not require the postulation of a single active failure of a component in conjunction with consequential failures resulting from a design basis tornado.

In the staff response it is stated that RG 1.117 was issued for comment in June 1976 and reflects the staff's position toward missile protection philosophy of the early and mid 1970's. However, by June of 1976 nearly all of the FNP design and much of the construction was completed, and as stated in our previous response, the design philosophy used by the FNP architect engineer was established in the early 1970's. Evidence to this effect was provided in our response dated January 23, 1998. This position is further supported by FSAR section 3A "Conformance with Regulatory Guides" which describes the FNP conformance of RG's through August of 1974. Section 3A serves as the design and licensing basis for FNP and states that RG 1.76 "Design Basis Tornado for Nuclear Power Plants" is the only regulatory guide concerning effects from tornado's to which FNP is committed. FNP does agree that structures, systems, or components required to achieve and maintain safe shutdown during a tornado event are required to be protected.

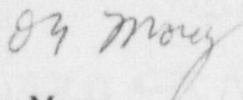
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This letter contains no formal NRC commitments. If you have any questions, please advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Dave Morey

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cc: Mr. L. A. Reyes, Region II Administrator  
Mr. J. I. Zimmerman, NRR Project Manager  
Mr. T. P. Johnson, Plant Sr. Resident Inspector  
Loren R. Plisco, Director, Division of Reactor Projects