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October 20, 1998

Docket Nos.: 50-348 50-364

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

Joseph M. Farley Nuclear Plant Response to Request for Additional Information Related to Plant Staff Qualifications

Ladies and Gentlemen:

On September 8, 1998, Southern Nuclear Operating Company, Inc (SNC) received a request for additional information from the NRC dated September 2, 1998, related to plant staff qualifications for the Joseph M. Farley Nuclear Plant (FNP), Units 1 and 2. In that letter, the NRC stated a concern related to FNP licensing basis commitments associated with 10 CFR 55, "Operator's Licenses." The concern stems from the disparity between the FNP commitment to American National Standards Institute (ANSI) N18.1-1971 made during the licensing of the plant and the revision to 10 CFR 55, which occurred in 1987. Regulatory Guide (RG) 1.8, Revision 2, issued April 1987, endorses, with conditions, certain parts of ANSI/ANS-3.1-1981 as an acceptable approach for certain plant positions for complying with the qualification and training requirements of 10 CFR 50 and 55. Endorsement for all other positions remains with ANSI N18.1-1971, "Selection and Training of N₄clear Power Plant Personnel."

The FNP Final Safety Analysis Report (FSAR) and the Technical Specifications (TSs) reflect FNP commitments made during the licensing of the plant. When 10 CFR 55 was revised in 1987, FNP modified the licensed operator training requirements to reflect the guidance provided in RG 1.8, Revision 2, "Qualification and Training of Personnel for Nuclear Power Plants." Additionally, in response to GL 87-07, SNC letter dated May 10, 1990 certified that the FNP licensed operator training program is both accredited and based upon a Systems Approach to Training (SAT). The INPO accredited, SAT-based licensed operator training program implemented at FNP encompasses the applicable requirements of the later standards.

FNP continues to have an accredited and SAT-based licensed operator training program. Although the FSAR and TSs continue to identify the FNP licensing basis commitment with regard to licensed operator training, FNP standards meet the requirements of 10 CFR 55.

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Therefore, SNC plans to revise the Improved Technical Specifications submittal during the submittal review period to reflect the use of an accredited program which has been endorsed by the NRC for FNP licensed operator training. In addition, changes to the FSAR will be made during the ITS implementation period.

If you have any additional questions, please advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

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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