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October 30, 1998

Docket Nos.: 50-348 50-364

10 CFR 50.54(f)

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555-0001

Joseph M. Farley Nuclear Plant

Response To Generic Letter 98-02, "Loss Of Reactor Coolant Inventory And Associated Potential For Loss Of Emergency Mitigation Functions While In A Shutdown Condition"

Ladies and Gentlemen:

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PDR

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On May 28, 1998, the NRC issued Generic Letter (GL) 98-02 to request information necessary to assess susceptibility to a common-cause failure of the emergency core cooling system (ECCS) as a result of reactor coolant system (RCS) drain down. Specifically, licensees were required to evaluate their susceptibility to an event similar to that which occurred at Wolf Creek on September 17, 1994. During this event a portion of the RCS inventory was inadvertently pumped to the RWST lowering the RCS level and increasing the RWST temperature such that flashing may have occurred in the common ECCS suction header. Had an ECCS actuation occurred, steam binding could have occurred in all of the ECCS pumps. This event was also the subject of Information Notice (IN) 95-03 dated January 12, 1995 and IN 95-03, Supplement 1, dated March 25, 1996.

Southern Nuclear Operating Company has conducted a review of the Farley Nuclear Plant (FNP) ECCS piping design and determined that certain design features can render the system susceptible to common-cause failure as a result of events similar to the Wolf Creek event. In accordance with Required Information Item 2 of GL 98-02, a description of the programs, procedures, and controls in place to preclude such an event is available at FNP for review.

This letter contains no formal NRC commitments and nothing stated herein should be considered as a license commitment.

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U.S. Nuclear Regulatory Commission

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

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

On mory Dave Morey

Sworn to and subscribed before me this 30 th day of October 1998 Martha Bayle Dow Notary Public My Commission Expires: Morenber 1, 2001

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Mr. L. A. Reyes, Region II Administrator CC: Mr. J. I. Zimmerman, NRR Project Manager Mr. T. P. Johnson, Plant Sr. Resident Inspector