

November 14, 1997

Mr. D. N. Morey  
Vice President - Farley Project  
Southern Nuclear Operating  
Company, Inc.  
Post Office Box 1295  
Birmingham, Alabama 35201-1295

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RELATED TO PROPOSED  
AMENDMENTS REGARDING PRESSURE TEMPERATURE LIMITS REPORT,  
FARLEY UNITS 1 AND 2 (TAC NOS. M99338 AND M99339)

Dear Mr. Morey:

By letter dated July 23, 1997, you submitted proposed amendments to the Facility Operating Licenses for Farley Nuclear Plant, Units 1 and 2. The amendments would change the Technical Specifications (TS) by relocating the reactor coolant system pressure and temperature limits from the TS to the proposed Pressure Temperature Limits Report in accordance with the guidelines of Generic Letter 96-03, "Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits."

The staff has reviewed your submittal and determined that additional information is required. The enclosure identifies the requested additional information needed.

In order to maintain a timely review, it is requested that the information be provided within 30 days of receipt of this letter. If you require any clarification regarding this request, please call me at (301) 415-2426.

Sincerely,  
ORIGINAL SIGNED BY W. GLEAVES FOR:  
Jacob I. Zimmerman, Project Manager  
Project Directorate II-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-348 and 50-364

Enclosure: Request for Additional Information

cc w/encl: See next page

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DOCUMENT NAME: G:\FARLEY\M99338.RAI

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in dark ink, appearing to read "Wan C. Zimmerman" or similar, is written above the typed name.

Jacob I. Zimmerman, Project Manager  
Project Directorate II-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-348 and 50-364

Enclosure: Request for Additional Information

cc w/encl: See next page

Joseph M. Farley Nuclear Plant

cc:

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U.S. Nuclear Regulatory Commission  
7388 N. State Highway 95  
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REQUEST FOR ADDITIONAL INFORMATION  
PRESSURE TEMPERATURE LIMITS REPORT  
FARLEY LICENSE AMENDMENT REQUEST

The proposed license amendments request approval to use a Pressure/Temperature Limits Report (PTLR) in accordance with Generic Letter 96-03, "Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits." Approval of the license amendments will allow the pressure/temperature (PT) limits to be changed without NRC approval. The proposed Technical Specification (TS) Section 6.9.15 references both the approved topical report, WCAP-14040-NP-A, Revision 2, "Methodology Used to Develop Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limits Curves," and the approved NRC safety evaluation report. However, the approved topical (pg. 3-6) states that the methodology is "applicable only when the pressurizer power-operated relief valves are used for the COMS [cold overpressure mitigating system]." Because the residual heat removal (RHR) relief valves are used for cold overpressure protection at Farley, the topical report is not applicable for developing setpoints for the RHR relief valves. The submittal does not state how the low-temperature overpressure protection (LTOP) setpoints are verified as acceptable. Although the LTOP or RHR setpoints are not being changed with this submittal or being moved to the proposed PTLR, each time the PT limits are revised the LTOP system must be reevaluated to ensure the current setpoints are acceptable for meeting the functional requirements of the system and capable of protecting the new PT limits. Because the approved methodology for determining the setpoints is not applicable to Farley, how will you demonstrate that the RHR setpoints are still acceptable relative to the new PT limits?

Because the approved methodology, which is referenced in the TS, is not applicable to RHR setpoints, please update the submittal and the proposed TS and describe in detail how the approved methodology will be applied. If a different methodology is presented to determine the RHR setpoints, the methodology should be described in detail, explaining how calculations will be performed and how to account for uncertainties and setpoint drift. A discussion of the limiting overpressure transients should be included and how controls are in place and will be maintained to assure the RHR relief valves will protect the plant for all low temperature overpressure transients. If a new methodology is used, it should also be referenced in the TS. Please include sample calculations for the first application (for the proposed PT limits) of the methodology. The required elements of a methodology are contained in the generic letter.

Enclosure