

August 27, 2024

NL-24-0329  
10 CFR 50.90

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

Joseph M. Farley Nuclear Plant Units 1 and 2  
Docket Nos. 50-348 and 50-364

Subject: License Amendment Request to Change Technical Specification 3.6.5, "Containment Air Temperature" Actions – Revised Completion Time

On July 18, 2024, Southern Nuclear Operating Company (SNC) requested a license amendment to the Technical Specifications (TS) for Joseph M. Farley Nuclear Plant (FNP), Units 1 and 2 renewed facility operating licenses NPF-2 and NPF-8, respectively (ADAMS Accession No. ML24201A108). The requested amendment would revise the operating license, Appendix A, Technical Specification (TS) 3.6.5, Containment Air Temperature, Actions upon exceeding the containment average air temperature limit and remove an expired Limiting Condition for Operation Note.

SNC is providing a revised format for the TS 3.6.5 Required Action A.3 Completion Time with the replacement pages in Enclosures 1 and 2 to this letter. Enclosure 3 provides corresponding TS 3.6.5 Bases revisions to be concurrently implemented for information only.

SNC continues to request expedited review and approval of the proposed license amendment by August 29, 2024. This license amendment will be implemented promptly upon issuance.

The replacement pages provided in Enclosures 1, 2, and 3 to this letter do not impact the regulatory evaluation (including the Significant Hazards Consideration Determination) or environmental considerations for the proposed changes provided in the July 18, 2024, submittal.

This letter contains no regulatory commitments. This letter has been reviewed and determined not to contain security-related information.

In accordance with 10 CFR 50.91, SNC is notifying the State of Alabama of this license amendment request by transmitting a copy of this letter and enclosures to the designated State Official.

If you have any questions, please contact Ryan Joyce at 205-992-6468.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on the 27<sup>th</sup> day of August 2024.

Respectfully submitted,



Jamie M. Coleman  
Director, Regulatory Affairs  
Southern Nuclear Operating Company

JMC/was/cbg

- Enclosure 1: Revised Technical Specification Page Markups
- Enclosure 2: Revised Technical Specification Pages
- Enclosure 3: Revised Technical Specification Bases Markups  
(for information only)

cc: NRC Regional Administrator, Region II  
NRR Project Manager – Farley 1 & 2  
Senior Resident Inspector – Farley 1 & 2  
Alabama – State Health Officer for the Department of Public Health  
RType: CFA04.054

**License Amendment Request to Change Technical Specification 3.6.5, “Containment Air Temperature” Actions – Revised Completion Time**

**Enclosure 1**

**Revised Technical Specification Page Markups**

3.6 CONTAINMENT SYSTEMS

3.6.5 Containment Air Temperature

LCO 3.6.5 Containment average air temperature shall be  $\leq 120^{\circ}\text{F}$ .

~~NOTE~~  
~~Containment average air temperature shall be  $\leq 122^{\circ}\text{F}$  until 0600 hours on September 9, 2023~~

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. Containment average air temperature not within limit.</p>	<p><u>A.1</u> <u>Verify containment average air temperature <math>\leq 122^{\circ}\text{F}</math>.</u></p> <p><u>AND</u></p> <p><u>A.2</u> <u>Verify refueling water storage tank temperature <math>\leq 100^{\circ}\text{F}</math>.</u></p> <p><u>AND</u></p> <p><u>A.34</u> Restore containment average air temperature to within limit.</p>	<p><u>8 hours</u></p> <p><u>AND</u></p> <p><u>Once per 8 hours thereafter</u></p> <p><u>8 hours</u></p> <p><u>AND</u></p> <p><u>Once per 8 hours thereafter</u></p> <p><del>NOTE</del></p> <p><u>Not to exceed 7 days cumulative in calendar year</u></p> <p><u>7 days</u><del>8 hours</del></p>

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. <u>AND</u>	6 hours
	B.2 Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.5.1 Verify containment average air temperature is within limit.	In accordance with the Surveillance Frequency Control Program

**License Amendment Request to Change Technical Specification 3.6.5, “Containment Air Temperature” Actions – Revised Completion Time**

**Enclosure 2**

**Revised Technical Specification Pages**

3.6 CONTAINMENT SYSTEMS

3.6.5 Containment Air Temperature

LCO 3.6.5            Containment average air temperature shall be  $\leq 120^{\circ}\text{F}$ .

APPLICABILITY:    MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Containment average air temperature not within limit.	A.1    Verify containment average air temperature $\leq 122^{\circ}\text{F}$ .	8 hours  <u>AND</u> Once per 8 hours thereafter
	<u>AND</u> A.2    Verify refueling water storage tank temperature $\leq 100^{\circ}\text{F}$ .	8 hours  <u>AND</u> Once per 8 hours thereafter
	<u>AND</u> A.3    Restore containment average air temperature to within limit.	-----NOTE----- Not to exceed 7 days cumulative in calendar year -----  7 days

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. <u>AND</u>	6 hours
	B.2 Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.5.1 Verify containment average air temperature is within limit.	In accordance with the Surveillance Frequency Control Program



**License Amendment Request to Change Technical Specification 3.6.5, “Containment Air Temperature” Actions – Revised Completion Time**

**Enclosure 3**

**Revised Technical Specification Bases Markups  
(for information only)**

BASES

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LCO During a DBA, with an initial containment average air temperature less than or equal to the LCO temperature limit, the resultant containment structure peak accident temperature is maintained below the containment design temperature. As a result, the ability of containment to perform its design function is ensured.

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APPLICABILITY In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material to containment. In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Therefore, maintaining containment average air temperature within the limit is not required in MODE 5 or 6.

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ACTIONS [A.1, A.2, and A.3](#)

When containment average air temperature is not within the limit of the LCO, ~~it must be restored to within limit within 8 hours~~ [the containment average air temperature must be verified to be  \$\leq 122^{\circ}\text{F}\$  within 8 hours and once every 8 hours thereafter \(Required Action A.1\). Required Action A.2 requires verification that the refueling water storage tank \(RWST\) temperature is  \$\leq 100^{\circ}\text{F}\$  to provide additional margin for the containment post-accident mass and energy release. The 8 hour Completion Time is reasonable to verify the containment average air temperature and the RWST temperature. The once per 8 hours thereafter is adequate to confirm the temperatures remain within the Required Action limits.](#)

~~This~~ Required Action [A.3](#) is necessary to return operation to within the bounds of the containment analysis. The ~~8-hour~~ [7 day](#) Completion Time is acceptable considering the sensitivity of the analysis to variations in this parameter and provides sufficient time to correct minor problems. [The Completion Time for Required Action A.3 is modified by a Note that limits time within the Required Action such that the Completion Time also expires when the cumulative time reaches 7 days in the calendar year. The cumulative time is tracked as actual time operating in Condition A and initially begins from the initial Condition A entry in the calendar year. Each entry and exit time for Condition A are tracked and added to the prior cumulative time\(s\).](#)

[Short-term exceedance of the containment average air temperature limit has been evaluated and determined to be of minimal impact to safety \(Ref. 3\).](#)

BASES

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ACTIONS  
(continued)

B.1 and B.2

If the containment average air temperature cannot be restored to within its limit within the required Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.5.1

Verifying that containment average air temperature is within the LCO limit ensures that containment operation remains within the limit assumed for the containment analyses. In order to determine the containment average air temperature, an arithmetic average is calculated using measurements taken at four of the following sensor locations with at least two being containment air cooler intake sensors:

<u>Instrument Number</u>	<u>Sensor Location</u>
TE3187 E, F, G, & H	Containment Air Cooler Intake
TE3188 H & I	Lower Compartment
TE3188 J	Reactor (lower)

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

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REFERENCES

1. FSAR, Section 6.2.
  2. 10 CFR 50.49.
  3. [Amendment Nos. ### and ### for Farley, Units 1 and 2, respectively, dated Month day, year.](#)
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