



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
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April 16, 2014

Charles R. Pierce  
Regulatory Affairs Director  
Southern Nuclear Operating Company, Inc.  
40 Inverness Center Parkway  
P.O. Box 1295 / BIN 038  
Birmingham, AL 35201-1295

SUBJECT: JOSEPH M. FARLEY NUCLEAR PLANT- UNIT 2 - STAFF ASSESSMENT OF THE SEISMIC WALKDOWN REPORT SUPPORTING IMPLEMENTATION OF NEAR-TERM TASK FORCE RECOMMENDATION 2.3 RELATED TO THE FUKUSHIMA DAI-ICHI NUCLEAR POWER PLANT ACCIDENT (TAC NO. MF0123)

Dear Mr. Pierce:

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued a request for information letter per Title 10 of the *Code of Federal Regulations*, Subpart 50.54(f) (50.54(f) letter). The 50.54(f) letter was issued to power reactor licensees and holders of construction permits requesting addressees to provide further information to support the NRC staff's evaluation of regulatory actions to be taken in response to lessons learned from Japan's March 11, 2011, Great Tōhoku Earthquake and subsequent tsunami. The request addressed the methods and procedures for nuclear power plant licensees to conduct seismic and flooding hazard walkdowns to identify and address degraded, nonconforming, or unanalyzed conditions through the corrective action program, and to verify the adequacy of the monitoring and maintenance procedures.

By letter dated November 27, 2012, as supplemented by letter dated September 4, 2013, Southern Nuclear Operating Company (SNC) submitted its Seismic Walkdown Report as requested in Enclosure 3 of the 50.54(f) letter for Joseph M. Farley Nuclear Plant, Unit 2 (FNP2). By letter dated November 25, 2013, Southern Nuclear Operating Company provided a response to the NRC request for additional information for the NRC staff to complete its assessments.

The NRC staff reviewed the information provided and, as documented in the enclosed staff assessment, determined that sufficient information was provided to be responsive to Enclosure 3 of the 50.54(f) letter.

C. Pierce

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If you have any questions, please contact me at 301-415-1009 or by e-mail at Shawn.Williams@nrc.gov

Sincerely,

A handwritten signature in black ink that reads "Shawn A. Williams". The signature is written in a cursive style with a long horizontal flourish at the end.

Shawn A. Williams, Senior Project Manager  
Plant Licensing Branch 2-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-364

Enclosure:  
Staff Assessment of Seismic  
Walkdown Report

cc w/encl: Distribution via Listserv

STAFF ASSESSMENT OF SEISMIC WALKDOWN REPORT  
NEAR-TERM TASK FORCE RECOMMENDATION 2.3 RELATED TO  
THE FUKUSHIMA DAI-ICHI NUCLEAR POWER PLANT ACCIDENT  
SOUTHERN NUCLEAR OPERATING COMPANY  
JOSEPH M. FARLEY NUCLEAR PLANT-UNIT 2  
DOCKET NO. 50-364

1.0 INTRODUCTION

On March 12, 2012,<sup>1</sup> the U.S. Nuclear Regulatory Commission (NRC) issued a request for information per Title 10 of the *Code of Federal Regulations*, Subpart 50.54(f) (50.54(f) letter) to all power reactor licensees and holders of construction permits in active or deferred status. The request was part of the implementation of lessons learned from the accident at the Fukushima Dai-ichi nuclear power plant. Enclosure 3, "Recommendation 2.3: Seismic,"<sup>2</sup> to the 50.54(f) letter requested licensees to conduct seismic walkdowns to identify and address degraded, nonconforming, or unanalyzed conditions using the corrective action program (CAP), verify the adequacy of monitoring and maintenance procedures, and report the results to the NRC.

Enclosure 3 of the 50.54(f) letter requested licensees to provide the following:

- a. Information concerning the plant-specific hazard licensing bases and a description of the protection and mitigation features considered in the licensing basis evaluation.
- b. Information related to the implementation of the walkdown process.
- c. A list of plant-specific vulnerabilities identified by the Individual Plant Examination of External Events (IPEEE) program and a description of the actions taken to eliminate or reduce them.
- d. Results of the walkdown including key findings and identified degraded, nonconforming, or unanalyzed conditions.
- e. Any planned or newly installed protection and mitigation features.
- f. Results and any subsequent actions taken in response to the peer review.

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<sup>1</sup> Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340

<sup>2</sup> ADAMS Accession No. ML12056A049

In accordance with the 50.54(f) letter, Enclosure 3, Required Response Item 2, licensees were required to submit a response within 180 days of the NRC's endorsement of the seismic walkdown process. By letter dated May 29, 2012,<sup>3</sup> the Nuclear Energy Institute (NEI) staff submitted Electric Power Research Institute document 1025286, "Seismic Walkdown Guidance for Resolution of Fukushima Near-Term Task Force Recommendation 2.3: Seismic," (walkdown guidance) to the NRC staff to consider for endorsement. By letter dated May 31, 2012,<sup>4</sup> the NRC staff endorsed the walkdown guidance.

By letter dated November 27, 2012,<sup>5</sup> Southern Nuclear Operating Company (the licensee) provided a response to Enclosure 3 of the 50.54(f) letter Required Response Item 2, for Joseph M. Farley Nuclear Plant, Unit 2 (FNP2). In addition to the aforementioned letter, the licensee, by letter dated September 4, 2013<sup>6</sup>, provided an updated submittal (Version 2) to the initial seismic walkdown report (Version 1). The updated report provides the results for the deferred seismic walkdowns of components which were inaccessible during the initial walkdowns. The NRC staff reviewed the walkdown report and determined that additional supplemental information would assist the NRC staff in completing its review. In a letter dated November 1, 2013<sup>7</sup>, the NRC staff requested additional information to gain a better understanding of the processes and procedures used by the licensee in conducting the walkdowns and walk-bys. The licensee responded to the NRC staff request by letter dated November 25, 2013.<sup>8</sup>

The NRC staff evaluated the licensee's submittals to determine if the information provided in the walkdown report met the intent of the walkdown guidance and if the licensee responded appropriately to Enclosure 3 of the 50.54(f) letter.

## 2.0 REGULATORY EVALUATION

The systems, structures and components (SSCs) important to safety in operating nuclear power plants are designed either in accordance with, or meet the intent of Appendix A to 10 CFR Part 50, General Design Criteria (GDC) 2: "Design Bases for Protection Against Natural Phenomena;" and Appendix A to 10 CFR Part 100, "Reactor Site Criteria." GDC 2 states that SSCs important to safety at nuclear power plants shall be designed to withstand the effects of natural phenomena such as earthquakes, tornadoes, hurricanes, floods, tsunami, and seiches without loss of capability to perform their safety functions.

For initial licensing, each licensee was required to develop and maintain design bases that, as defined by 10 CFR 50.2, identify the specific functions that an SSC of a facility must perform, and the specific values or ranges of values chosen for controlling parameters as reference bounds for the design.

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<sup>3</sup> ADAMS Package Accession No. ML121640872

<sup>4</sup> ADAMS Accession No. ML12145A529

<sup>5</sup> ADAMS Accession No. ML130040368

<sup>6</sup> ADAMS Accession No. ML13252A148.

<sup>7</sup> ADAMS Accession No. ML13304B418

<sup>8</sup> ADAMS Accession No. ML13330A555

The design bases for the SSCs reflect appropriate consideration of the most severe natural phenomena that have been historically reported for the site and surrounding area. The design bases also reflect sufficient margin to account for the limited accuracy, quantity, and period of time in which the historical data have been accumulated.

The current licensing basis is the set of NRC requirements applicable to a specific plant, including the licensee's docketed commitments for ensuring compliance with, and operation within, applicable NRC requirements and the plant-specific design basis, including all modifications and additions to such commitments over the life of the facility operating license.

### 3.0 TECHNICAL EVALUATION

#### 3.1 Seismic Licensing Basis Information

The licensee provided information on the plant-specific licensing basis for the Seismic Category I SSCs for FNP2 in Section 3.0 of the walkdown report. Consistent with the walkdown guidance, the NRC staff noted that the report includes a summary of the Safe Shutdown Earthquake (SSE) and a description of the codes, standards, and methods that were used in the design of the Seismic Category I SSCs for meeting the plant-specific seismic licensing basis requirements. The NRC staff reviewed Section 3.0 of the walkdown report, focusing on the summary of the SSE and the design codes used in the design.

Based on the NRC staff's review, the NRC staff concludes that the licensee has provided information on the plant-specific seismic licensing basis and a description of the protection and mitigation features considered in the licensing bases evaluation consistent with Section 8, Submittal Report, of the walkdown guidance.

#### 3.2 Seismic Walkdown Methodology Implementation

Section 2; Personnel Qualifications; Section 3, Selection of SSCs; Section 4, Seismic Walkdowns and Area Walk-Bys; and Section 5, Seismic Licensing Basis Evaluations, of the walkdown guidance provide information to licensees regarding the implementation of an appropriate seismic walkdown methodology. By letter dated July 9, 2012,<sup>9</sup> the licensee confirmed that it would utilize the walkdown guidance in the performance of the seismic walkdowns at FNP2.

The walkdown report dated November 27, 2012, as supplemented on September 4, 2013, did not identify deviations from the walkdown guidance.

The NRC staff reviewed the following sections of the walkdown methodology implementation provided in the walkdown report:

- Personnel Qualifications
- Development of the Seismic Walkdown Equipment Lists (SWELs)
- Implementation of the Walkdown Process
- Licensing Basis Evaluations and Results

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<sup>9</sup> ADAMS Accession No. ML12192A516

### 3.2.1 Personnel Qualifications

Section 2, Personnel Qualifications, of the walkdown guidance provides licensees with qualification information for personnel involved in the conduct of the seismic walkdowns and area walk-bys.

The NRC staff reviewed the information provided in Section 4, and Attachment 6 of the walkdown report, which includes information on the walkdown personnel and their qualifications. Specifically, the NRC staff reviewed the summary of the background, experience, and level of involvement for the following personnel involved in the seismic walkdown activities: equipment selection personnel, seismic walkdown engineers (SWEs), licensing basis reviewers, IPEEE reviewers, peer review team, and operations staff.

Based on the review of the licensee's submittals, the NRC staff concludes that those involved in the seismic walkdown activities have the appropriate seismic background, knowledge and experience, as specified in Section 2 of the walkdown guidance.

### 3.2.2 Development of the SWELs

Section 3, Selection of SSCs, of the walkdown guidance provides information to licensees for selecting the SSCs that should be placed on the SWELs, so that they can be walked down by qualified personnel.

The NRC staff reviewed the overall process used by the licensee to develop the FNP2 base list, SWEL 1 (sample list of designated safety functions equipment), and SWEL 2 (sample list of spent fuel pool related equipment). The overall equipment selection process followed the screening process shown in Figures 1-1 and 1-2 of the walkdown guidance. Based on Sections 6.1 and 6.2 of the walkdown report, FNP2 SWELs 1 and 2 meet the inclusion requirements of the walkdown guidance. Specifically, the following attributes were considered in the sample selection:

- A variety of systems, equipment and environments
- IPEEE equipment
- Major new or replacement equipment
- Risk considerations

Due to individual plant configurations and the walkdown guidance screening process followed to select the final SWEL equipment, it is possible that some classes of equipment will not be represented on the SWEL. The walkdown guidance recognizes this is due to the equipment not being present in the plant (e.g., some plants generate DC power using inverters and therefore do not have motor generators) or the equipment being screened out during the screening process (the screening process is described in Section 3 of the walkdown guidance). Based on the information provided, the NRC staff noted that a detailed explanation was provided justifying cases where specific classes of equipment were not included as part of the SWEL, and concludes that these exclusions are acceptable.

The NRC staff noted that a rapid drain-down list was not included as part of the SWEL 2. The licensee discussed the approach to identify all items that can lead to rapid drain down in Section 6.2 of the walkdown report. The licensee indicated that the FNP2 spent fuel pool (SPF)

does not contain penetrations within 10 feet of the fuel and that the design of the anti-siphon hole in the SFP discharge piping prevents water from being siphoned through this piping. The licensee stated that no rapid drain-down of the pool can occur and therefore there are no components associated with rapid drain-down of the SFP included on the SWEL 2. After reviewing the information provided in this section, the NRC staff concludes that the licensee provided sufficient justification for not including rapid drain-down items as part of the SWEL 2.

In Section 6.0 of the initial and updated walkdown report, the licensee stated that several SWEL components were removed or replaced from the SWEL, following the provisions in the walkdown guidance, due to plant equipment accessibility. In Attachment 1 of the initial and updated reports, the licensee included the final SWELs resulting from the completed walkdowns.

After reviewing SWELs 1 and 2, the NRC staff concludes that the sample of SSCs represents a diversity of component types and assures inclusion of components from critical systems and functions, thereby meeting the intent of the walkdown guidance. In addition, the NRC staff notes that the equipment selection personnel were appropriately supported by plant operations staff as described in the walkdown guidance.

### 3.2.3 Implementation of the Walkdown Process

Section 4, Seismic Walkdowns and Area Walk-Bys, of the walkdown guidance provides information to licensees regarding the conduct of the seismic walkdowns and area walk-bys for each site.

The NRC staff reviewed Section 7.0 of the walkdown report, which summarizes the results of the seismic walkdowns and area walk-bys, including an overview of the number of items walked down and the number of areas walked-by. The walkdown report states that teams consisting of two qualified SWEs conducted the seismic walkdowns and area walk-bys. According to the signed seismic walkdown checklists (SWCs) and area walk-bys checklists (AWCs), these activities were conducted during the weeks of August 21, 2012 and September 12, 2012, with two items inspected on October 25, 2012 and another item inspected on November 13, 2012. In addition, according to Table 7-1 of the supplemental report, a subsequent set of walkdowns were performed during January 7 through May 17, 2013, to complete a number of items that were inaccessible during the initial walkdowns. By letter dated September 4, 2013, the licensee submitted an updated walkdown report describing the results of these subsequent seismic walkdowns. Attachments 3 and 4 (initial walkdown report, Version 1) and Attachments 7 and 8 (updated walkdown report, Version 2) of the walkdown report provide the completed SWCs and AWCs, respectively, documenting the results for each item of equipment on SWEL 1 and SWEL 2 and each area containing SWEL equipment. The licensee used the checklists provided in Appendix C of the walkdown guidance report without modification.

In the updated walkdown report, the licensee stated that the 32 planned cabinet inspections were completed and that five of the seven remaining inaccessible items were also inspected. The NRC staff noted that two items (Items 5 and 9 in Table 7-1), which could not be completely inspected during the subsequent walkdown, were removed from the SWEL 1. The licensee deemed these items inaccessible due to location, and inability to disassembly and fully inspect welds of the cabinet to the floor structure, respectively. In the executive summary of the walkdown report, the licensee stated that these changes to the SWEL (removal of items 5 and 9) should be acceptable

since an adequate number of similar component walkdowns that satisfy the minimum SWEL component types for this category were performed. Furthermore, NRC, FAQ (Frequently Asked Questions) Inaccessible Equipments (NRC's Revised Position - Provided to Inspection Branch on September 18, 2012) clarifies that for those items needing extensive disassembly they may be waived for inspections, provided justifications are given. The NRC staff reviewed the justification and concluded that samples included in the SWEL meets the intent of the walkdown guidance. The staff reviewed these justifications and determined that these removal from the list of SWEL 1 does not affect the overall judgment of the diversity of the SWEL equipment. The number of samples included in the SWEL still meets the walkdown guidance.

The licensee documented cases of potentially adverse seismic conditions (PASCs) in the checklists for further evaluation. Table 8-1 of the initial and updated walkdown reports list the PASCs identified during the seismic walkdowns and the area walk-bys. The table describes how each condition was addressed (e.g., placement in the CAP), its resolution and current status.

Based on the initial review of the checklists, the NRC staff was unable to confirm that all the PASCs identified during the walkdowns were included in this table. As such, by letter dated November 1, 2013, the NRC staff issued two questions in a request for additional information (RAI) in order to obtain clarification regarding the process followed by the licensee when evaluating conditions identified in the field during the walkdowns and walk-bys. Specifically, in RAI 1 the NRC staff requested the licensee to provide further explanation regarding how a field observation was determined to be PASC, and to ensure that the basis for determination was addressed using normal plant processes and documented in the walkdown report. In response to RAI 1, the licensee provided a summary of the overall process used to evaluate observations identified in the field by the SWEs and the support plant personnel (e.g operators, electricians and engineering). The licensee indicated that all component walkdowns and area walk-bys were documented on the SWCs and AWCs; including the field determinations marked by Yes ("Y"), No ("N"), or Unknown ("U"). The licensee indicated that components free from potentially adverse seismic conditions were marked as "Y" on the checklists. For the components not free from potentially adverse seismic conditions, the licensee marked them as "N" on the checklists, and created conditions report to further evaluate and resolve the condition. Furthermore, the licensee stated that it entered all PASCs into the plant's CAP. Table 8-1 "Potentially Adverse Conditions" of the walkdown report provides a listing of the conditions entered into the CAP. In addition, for the portions of the walkdowns that could not be completed due to equipment inaccessibility, the licensee marked them as "U" on the checklists and deferred them for additional inspection during its next outage. The licensee confirmed that all "U" items were completed by the end of its refueling outage 1R25. In addition, the licensee also confirmed that all PASCs, identified during the walkdowns and walk-bys, were addressed and included in the submitted reports.

After evaluating the licensee's response and reviewing Table 8-1, the NRC staff concludes that the licensee responded appropriately to RAI 1 and PASCs were properly identified and documented.

In addition to the information provided above, the licensee stated in Section 7.0 of the walkdown report that anchorage configurations were verified to be consistent with existing plant documentation for at least 50 percent of the SWEL items, in accordance with Section 4 of the walkdown guidance.

Section 7.1 of the updated walkdown report (Version 2) confirms that the walkdowns were conducted to inspect the inaccessible equipment and selected electrical equipment cabinets that were not completely inspected or were not opened during the initial walkdowns. The licensee stated that the initial walkdown checklists were modified, for the applicable components, in order to document the supplemental inspection evaluations. The NRC staff reviewed the seismic walkdown checklists and area walk-bys provided in Attachments 7 and 8 of the updated report and confirmed that cabinets were opened to determine if any adverse conditions existed for internal equipment and that all supplemental inspections for inaccessible equipment were also inspected. In addition, the NRC staff concludes that the process followed to update these checklists was acceptable since all the issues and their resolutions identified in the field were properly documented in the checklists.

Based on the information provided in the licensee's submittals, the NRC staff concludes that the licensee's implementation of the walkdown process meets the intent of the walkdown guidance.

#### 3.2.4 Licensing Basis Evaluations and Results

Section 5, Seismic Licensing Basis Evaluations, of the walkdown guidance provides information to licensees regarding the conduct of licensing basis evaluations for items identified during the seismic walkdowns as degraded, nonconforming, or unanalyzed that might have potential seismic significance.

The NRC staff reviewed Section 8.0 "Results" of the FNP2 walkdown report, which discusses the process for conducting the seismic licensing basis evaluations of the PASCs identified during the seismic walkdowns and area walk-bys. The licensee stated that it performed preliminary licensing basis evaluations, for some of the identified PASCs, as part of the generation of the CAP entries. The licensee stated that as PASCs were identified, conditions reports were initiated in the plant's CAP and evaluated. Table 8-1 of the walkdown report lists the key licensee findings, and provides a complete list of the potentially degraded, nonconforming, or unanalyzed conditions relative to their licensing basis. The table also provides the actions taken or planned to address these conditions, including the current status of each of the items the licensee entered into the CAP.

Section 8.4 of the updated walkdown report indicates that housekeeping items were identified, during walkdowns and walk-bys. All such items were brought to the attention of plant personnel and CRs were generated as necessary. These issues included water on the floor and loose items (small tools, trash, etc.) stored in the plant areas. The licensee stated that these items were processed through the plant's CAP process and are not specifically documented in the walkdown report though are available in the plant CAP database.

The NRC staff reviewed the CAP entries and the description of the actions taken or planned to address deficiencies. The NRC staff concludes that the licensee appropriately identified potentially degraded, nonconforming, or unanalyzed conditions and entered them into the CAP, which meets the intent of the walkdown guidance.

### 3.2.5 Conclusion

Based on the discussion above, the NRC staff concludes that the licensee's implementation of seismic walkdown methodology meets the intent of the walkdown guidance for personnel qualifications, development of SWELs, implementation of the walkdown process, and seismic licensing basis evaluations.

### 3.3 Peer Review

Section 6, Peer Review, of the walkdown guidance provides licensees with information regarding the conduct of peer reviews for the activities performed during the seismic walkdowns. Page 6-1 of the walkdown guidance identifies the following activities to be conducted during the peer review process:

- Review the selection of the SSCs included on the SWELs
- Review a sample of the checklists prepared for the seismic walkdowns and area walk-bys
- Review the licensing basis evaluations
- Review the decisions for entering the potentially adverse conditions into the CAP
- Review the walkdown report
- Summarize the results of the peer review process in the walkdown report

The NRC staff reviewed the information provided in Section 9.0 of the FNP2 initial and updated walkdown reports which describes the conduct of the peer review. In addition, the NRC staff reviewed the response to RAI 2. In RAI 2, the NRC staff requested the licensee to provide additional information on the overall peer review process that was followed as part of the walkdown activities. Specifically, the NRC staff requested the licensee to confirm that the activities identified in page 6-1 of the walkdown guidance were assessed and documented in the report. The licensee was also requested to confirm that any individual involved in performing any given walkdown activity was not a peer reviewer for that same activity. In response to RAI 2, the licensee confirmed that all the activities identified on page 6-1 of the walkdown guidance were included as part of the peer review process and referred to the summary of the peer review activities provided in Section 9.0 of the walkdown report. In addition, the licensee stated that none of the individuals performing a given walkdown activity was a peer reviewer team member for that same activity.

The staff reviewed the licensee's summary of each of these activities, which included the peer review team members' level of involvement, the peer review findings, and resolution of peer review comments. After reviewing the licensee's submittals, the NRC staff concludes that the licensee sufficiently documented the results of the peer review activities and how these reviews affected the work described in the walkdown report.

Based on the discussion above, the NRC staff concludes that the licensee's results of the peer review and subsequent actions taken in response to the peer review meets the intent of Section 6 of the walkdown guidance.

### 3.4 IPEEE Information

Section 7, IPEEE Vulnerabilities, of the walkdown guidance provides information to licensees regarding the reporting of the evaluations conducted and actions taken in response to seismic vulnerabilities identified during the IPEEE program. Through the IPEEE program and Generic Letter 88-20, "Individual Plant Examination of External Events for Severe Accident Vulnerabilities – 10 CFR 50.54(f)," dated November 23, 1998<sup>10</sup>, licensees previously had performed a systematic examination to identify any plant-specific vulnerabilities to severe accidents.

The licensee provided background information in Section 5.0 of the walkdown report regarding their IPEEE program. The licensee stated that the FNP2 SWEL included 18 items for which seismic vulnerabilities (i.e., seismic anomalies, outliers or other findings) were previously identified during the IPEEE program. A description of these conditions and the actions taken to eliminate or reduce these seismic vulnerabilities were provided in Attachment 5 of the walkdown report. During the walkdowns, the SWEs verified that the resolutions to the IPEEE vulnerabilities associated with these 18 items were implemented. The licensee stated that FPN2 completed modifications for all non-relay items on or before December 31, 1995 and for all relays on or before December 31, 1996.

Based on the NRC staff's review of Section 5.0 and Attachment 5 of the walkdown report, the NRC staff concludes that the licensee's identification of plant-specific vulnerabilities (including anomalies, outliers and other findings) identified by the IPEEE program, as well as actions taken to eliminate or reduce them, meets the intent of Section 7 of the walkdown guidance.

### 3.5 Planned Upgrades

The licensee did not identify any plant changes or any planned or newly installed protection and mitigation features in the walkdown report.

### 3.6 NRC Oversight

#### 3.6.1 Independent Verification by Resident Inspectors

On July 6, 2012,<sup>11</sup> the NRC issued Temporary Instruction (TI) 2515/188 "Inspection of Near-Term Task Force Recommendation 2.3 Seismic Walkdowns." In accordance with the TI, NRC inspectors independently verified that the FNP2 licensee implemented the seismic walkdowns in accordance with the walkdown guidance. Additionally, the inspectors independently performed walkdowns of a sample of seismic protection features. The inspection report dated January 31, 2013,<sup>12</sup> documents the results of this inspection and states that no findings were identified.

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<sup>10</sup> ADAMS Accession No. ML031150465.

<sup>11</sup> ADAMS Accession No. ML12156A052.

<sup>12</sup> ADAMS Accession No. ML13031A490.

#### 4.0 CONCLUSION

The NRC staff concludes that the licensee's implementation of seismic walkdown methodology meets the intent of the walkdown guidance. The NRC staff concludes that, the licensee, through the implementation of the walkdown guidance activities and, in accordance with plant processes and procedures, verified the plant configuration with the current seismic licensing basis; addressed degraded, nonconforming, or unanalyzed seismic conditions; and verified the adequacy of monitoring and maintenance programs for protective features. Furthermore, the NRC staff notes that no immediate safety concerns were identified. The NRC staff reviewed the information provided and determined that sufficient information was provided to be responsive to Enclosure 3 of the 50.54(f) letter.

C. Pierce

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If you have any questions, please contact me at 301-415-1009 or by e-mail at Shawn.Williams@nrc.gov.

Sincerely,

**/RA/**

Shawn A. Williams, Senior Project Manager  
Plant Licensing Branch 2-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-364

Enclosure:  
Staff Assessment of Seismic  
Walkdown Report

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