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October 8, 2008

Docket Nos.: 50-348  
50-364

NL-08-1519

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

Joseph M. Farley Nuclear Plant, Units 1 & 2  
Response to Request for Information Regarding  
Revision to Technical Specifications 3.3.1, 3.3.2, 3.3.6, 3.3.7, and 3.3.8

Ladies and Gentlemen:

In letter dated December 20, 2007, Southern Nuclear Operating Company (SNC) requested an application for amendment to Facility Operating License Nos. NPF-2 (Unit 1) and NPF-8 (Unit 2) for Joseph M. Farley Nuclear Plant (FNP), in accordance with the provisions of 10 CFR 50.90. The proposed amendment would revise Technical Specification (TS) 3.3.1, "Reactor Trip System (RTS) Instrumentation," TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," TS 3.3.6, "Containment Purge and Exhaust Isolation Instrumentation," TS 3.3.7, "Control Room Emergency Filtration/Pressurization System (CREFS) Actuation Instrumentation," and TS 3.3.8, "Penetration Room Filtration (PRF) System Actuation Instrumentation" to adopt Completion Time, bypass test time, and Surveillance Requirement (SR) Frequency changes. These changes are approved by the NRC in WCAP-14333-P-A, Revision 1, "Probabilistic Risk Analysis of the RTS and ESFAS Test Times and Completion Times," October 1998 and WCAP-15376-P-A, Revision 1, "Risk-Informed Assessment of the RTS and ESFAS Surveillance Test Intervals and Reactor Trip Breaker Test and Completion Times," March 2003. The proposed amendments would revise SR 3.3.1.8 to adopt SR Frequency changes approved by the NRC in Industry/TSTF Standard Technical Specification (STS) Change Traveler 242, Revision 1, "Increase the time to perform a COT on Power Range and Intermediate Range Instruments." The proposed amendments would revise the Completion Times of LCO 3.3.1, Condition F from 2 hours to 24 hours consistent with changes approved by the NRC in Industry/TSTF STS Change Traveler 246, Revision 0, "RTS Instrumentation, 3.3.1 Condition F Completion Time." Finally, the proposed amendments would provide for minor editorial changes.

SNC requested approval of the proposed amendment request by December 1, 2008. It is anticipated that the license amendment, as approved, will be effective upon issuance and will be implemented within 90 days from the date of issuance.

(Affirmation and signature are provided on the following page.)

On September 10, 2008 the NRC identified additional information needed to complete its review of this amendment request. The SNC response to the requested information is provided in Enclosure 1.

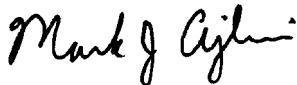
A copy of the proposed changes has been sent to Dr. D. E. Williamson, the Alabama State Designee, in accordance with 10 CFR 50.91(b)(1).

Mr. M.J. Ajluni states he is the Manager, Nuclear Licensing of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company, and to the best of his knowledge and belief, the facts set forth in this letter are true.

If you have any questions, please advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



M.J. Ajluni  
Manager, Nuclear Licensing

Sworn to and subscribed before me this 8<sup>th</sup> day of October,  
2008.

  
Notary Public

My commission expires: 7-21-2012

MJA/BDM/phr

Enclosure: 1.SNC Response to Request for Information

cc: Southern Nuclear Operating Company  
Mr. J. T. Gasser, Executive Vice President  
Mr. J. R. Johnson, Vice President – Farley  
Mr. D. H. Jones, Vice President – Engineering  
RTYPE: CFA04.054; LC#14827

U. S. Nuclear Regulatory Commission  
Mr. L. A. Reyes, Regional Administrator  
Mr. K. D. Feintuch, NRR Project Manager – Farley  
Mr. E. L. Crowe, Senior Resident Inspector – Farley

Alabama Department of Public Health  
Dr. D. E. Williamson, State Health Officer

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**Enclosure 1**

**SNC Response to Request for Information**

**Enclosure 1**  
**SNC Response to Request for Information**

NRC I & C Question

The license amendment request (LAR) proposes Technical Specification (TS) changes that would revise allowed outage times (AOT), bypass test times, and surveillance test interval (STI) extensions for TS 3.3.1, "Reactor Trip System (RTS) Instrumentation," TS 3.3.2, "Engineered Safety Features Actuation System (ESFAS) Instrumentation," TS 3.3.6, "Containment Purge and Exhaust Isolation Instrumentation," TS 3.3.7, "Control Room Emergency Filtration Pressurization System (CREFS) Actuation Instrumentation," and TS 3.38, "Penetration Room Filtration (PRF) System Actuation Instrumentation." The proposed revisions are based on WCAP-14333-P-A, Revision 1, "Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times," dated October 1998, WCAP-15376-P-A, Revision 1, "Risk-Informed Assessment of the RTS and ESFAS Surveillance Test Intervals and Reactor Trip Breaker Test and Completion Times," dated March 2003, TSTF-242, Revision 1, "Increase the time to perform a COT on Power Range and Intermediate Range Instruments," and TSTF-246, "RTS Instrumentation, 3.3.1 Condition F Completion Time."

To support the Nuclear Regulatory Commission's assessment of the acceptability of the LAR in regard to AOT, bypass test times, and STI extensions, please provide the following:

1. The majority of the plant specific responses to WCAP-14333 and WCAP-15376 are included in the proprietary portion of the LAR. Please provide a non-proprietary summary of the plant specific responses to each of the two conditions in the July 15, 1998 safety evaluation for WCAP-14333 and the five conditions in the December 20, 2002 safety evaluation for WCAP-15376.

SNC Response

Enclosure 1B, Basis for Proposed Changes (Non-Proprietary), of SNC's letter NL-07-2266 dated December 20, 2007 included all of the safety evaluation responses for WCAP-14333 and WCAP-15376 except for Condition 1 and Condition 4. Provided below are Non-Proprietary summaries for Condition 1 and Condition 4.

WCAP-14333 and WCAP-15376 SE Condition 1

In order to address SE Condition 1 for each WCAP, Westinghouse issued implementation guidelines for each WCAP to allow licensees to confirm the analyses are applicable to their plant. In the implementation guideline for WCAP-15376-P-A, it is suggested that if a plant has not implemented WCAP-14333-P-A, Rev. 1, "Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times," that they consider implementing WCAP-14333 when implementing WCAP-15376. In the guideline it states that it should be noted that Table 2, "Applicability of Analysis Reactor Trip Actuation Signals," and Table 3, "Applicability of Analysis Engineered Safety Features Actuation Signals," are the same in the implementation guideline for both WCAP-14333 and WCAP-15376. Therefore, since both WCAPs are being implemented at the same time, Tables 2 and 3 only have to be completed one time. The information identified in the tables from the guidelines which confirm the applicability of WCAP 14333 and 15376 to Farley is included in this subsection

**Enclosure 1**  
**SNC Response to Request for Information**

(Tables 1A, 1B, 2, 3 and 4). To address SE Condition 1 for WCAP-15376, additional information is required. This information is contained below.

A licensee is expected to confirm the applicability of the topical report to their plant, and to perform a plant-specific assessment of containment failures and address any design or performance differences that may affect the proposed changes.

This Condition is addressed in two parts. The first part confirms the applicability of the topical report to Farley, and the second part addresses the containment failure issue.

Applicability of the SSPS master relay and SSPS safeguards driver card failure probabilities.

It is necessary to indicate that component failure probabilities developed as part of WCAP-15376 are applicable to Farley Nuclear Plant (FNP). Farley is an SSPS plant, so the information provided includes the master relay and safeguards driver card failure probabilities. The failure probabilities used in the generic analysis for these components are provided on Table 8.6 of the WCAP.

A summary of the experience for these components at FNP from 2000 to 2005 is provided below.

SSPS Master Relays		
Unit	Number of Surveillances	Unsafe Failures
1	1425	0
2	1520	0

SSPS Safeguards Driver Cards		
Unit	Number of Surveillances	Unsafe Failures
1	225	0
2	240	0

Based on the above history, the failure probabilities provided in WCAP-15376 are applicable to Farley.

Containment Failure Assessment

Farley Nuclear Plant utilizes the large dry containment design for each unit. The Farley Containment Failure Analysis is consistent with the assumptions of the generic analysis for WCAP-15376-P.

**Enclosure 1**  
**SNC Response to Request for Information**

**WCAP-15376 SE Condition 4**

A plant specific assessment was performed to confirm the applicability of the WCAP-15376 analysis, including the model assumptions for human reliability, to FNP Unit Nos. 1 and 2. The results of this assessment are provided in Enclosures 1A.