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January 18, 2012

Docket Nos.: 50-364

NL-11-0299

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

Joseph M. Farley Nuclear Plant Unit 2

<u>Application to Amend Surveillance Requirement 3.4.11.1 and 3.4.11.4</u>

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) proposes to amend the Joseph M. Farley Nuclear Plant (FNP) Unit 2 Technical Specifications (TS) by removing requirements no longer applicable due to the completion of FNP Unit 2 Cycle 16. The proposed change to FNP Unit 2 SR 3.4.11.1 Note 3 and SR 3.4.11.4 is detailed in the attached enclosures.

SNC requests approval of the proposed license amendment by December 9, 2012. The proposed changes would be implemented within 60 days of issuance of the amendment.

U. S. Nuclear Regulatory Commission NL-11-0299 Page 2

Mr. M. J. Ajluni states he is Nuclear Licensing Director 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.

This letter contains no NRC commitments. If you have any questions, please contact Jack Stringfellow at (205) 992-7037.

Respectfully submitted,

Nuclear Licensing Director

Mark of Cight

Sworn to and subsofiled before me this 18 th day of January, 2012.

My commission expires: 11/0z/13

MJA/SYA/lac

Enclosures:

- 1. Basis for Proposed Change
- 2. Technical Specifications Marked-up Pages
- 3. Technical Specifications Clean Typed Pages
- 4. Technical Specifications Bases Marked-up Pages (For Information Only)

cc: Southern Nuclear Operating Company

Mr. S. E. Kuczynski, Chairman, President & CEO

Mr. D. G. Bost, Chief Nuclear Officer

Mr. T. A. Lynch, Vice President - Farley

Mr. B. L. Ivey, Regulatory Affairs Vice President

Ms. P. M. Marino, Vice President - Engineering

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U. S. Nuclear Regulatory Commission NL-11-0299 Page 3

U. S. Nuclear Regulatory Commission

Mr. V. M. McCree, Regional Administrator

Mr. R. E. Martin, NRR Project Manager - Farley

Mr. E. L. Crowe, Senior Resident Inspector - Farley

Alabama Department of Public Health

Dr. D. E. Williamson, State Health Officer

Enclosure 1

Basis for Proposed Change

Basis for Proposed Change

Table of Contents

- 1.0 Summary Description
- 2.0 Detailed Description
- 3.0 Technical Evaluation
- 4.0 Regulatory Evaluation
 - 4.1 Significant Hazards Consideration
 - 4.2 Applicable Regulatory Requirements / Criteria
 - 4.3 Conclusions
- 5.0 Environmental Consideration

1.0 Summary Description

This license amendment request is to amend Operating License (OL) NPF – 8 for Joseph M. Farley Nuclear Plant (FNP) Unit 2. The proposed change removes requirements no longer applicable. This proposed change will delete Note 3 from FNP Surveillance Requirement (SR) 3.4.11.1 and delete SR 3.4.11.4, entirely.

2.0 Detailed Description

The proposed changes to FNP Unit Technical Specifications are listed below:

FNP Unit 2 TS Section	FNP Unit 2 SR statement	Proposed Revision to FNP Unit 2 TS
Note 3 of SR 3.4.11.1	Not required to be performed for Unit 2 for the remainder of operating cycle 16 for Q2B31MOV8000B.	Delete
SR 3.4.11.4	NOTE	Delete

3.0 Technical Evaluation

On June 13, 2003, the Nuclear Regulatory Commission (NRC) issued Amendment No. 151 for FNP Unit 2 which added Note 3 to Surveillance Requirement (SR) 3.4.11.1 and created new SR 3.4.11.4. Note 3 to SR 3.4.11.1 eliminated the requirement to cycle the Unit 2 Pressurizer Power Operated Relief Valve (PORV) Q2B31MOV8000B during the remainder of operating Cycle 16. This amendment also added SR 3.4.11.4 as a compensatory action for the block valve while SR 3.4.11.1 was suspended.

This license amendment request proposes to delete Note 3 from SR 3.4.11.1 and delete SR 3.4.11.4 entirely from the FNP Unit 2 TS. This change is administrative in nature, because Cycle 16 for FNP Unit 2 has been completed; FNP Unit 2 is currently operating in Cycle 22. Therefore, SR 3.4.11.1 Note 3 and SR 3.4.11.4 are no longer applicable.

4.0 Regulatory Evaluation

4.1 Significant Hazards Consideration

Southern Nuclear Operating Company (SNC) has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change will remove Note 3 from Surveillance Requirement (SR) 3.4.11.1 and delete SR 3.4.11.4 from the Joseph M. Farley Nuclear Plant (FNP) Unit 2 Technical Specifications (TS). SR 3.4.11.1 Note 3 was incorporated into the FNP Unit 2 TS as a result of a license amendment request granted to SNC on June 3, 2003, which allowed SNC to suspend cycling the Unit 2 Pressurizer Power Operated Relief Valve (PORV) Q2B31MOV8000B during the remainder of operating cycle 16. Additionally, TS SR 3.4.11.4 was added to provide a compensatory action for the block valve while SR 3.4.11.1 was suspended.

SR 3.4.11.1 Note 3 and SR 3.4.11.1 were applicable for the remainder of operating Cycle 16 which has been completed; FNP Unit 2 is currently operating in Cycle 22. Note 3 to SR 3.4.11.1 and SR 3.4.11.4 are no longer applicable; therefore, this proposed change is administrative in nature.

This proposed administrative license amendment does not impact any accident initiators, analyzed events, or assumed mitigation of accident or transient events. The proposed change does not involve the addition or removal of any equipment or any design changes to the facility. The proposed change does not affect any plant operations, design function, or analysis that verifies the capability of structures, systems, and components (SSCs) to perform a design function. The proposed change does not change any of the accidents previously evaluated in the Updated Final Safety Analysis Report (UFSAR). The proposed change does not affect SSCs, operating procedures, and administrative controls that have the function of preventing or mitigating any of these accidents.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated? Response: No.

This proposed administrative license amendment does not affect actual plant equipment or accident analyses. The proposed change will not change the design function or operation of any SSCs nor result in any new failure mechanisms, malfunctions, or accident initiators not considered in the design and licensing bases. The proposed amendment does not impact any accident initiators, analyzed events, or assumed mitigation of accident or transient events.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The proposed change does not involve any physical changes to the plant or alter the manner in which plant systems are operated, maintained, modified, tested, or inspected. The proposed change does not alter the manner in which safety limits, limiting safety system settings or limiting conditions for operation are determined. The safety analysis acceptance criteria are not affected by this change. The proposed change will not result in plant operation in a configuration outside the design basis. The proposed change does not adversely affect systems that respond to safely shutdown the plant and to maintain the plant in a safe shutdown condition

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, SNC concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.2 Applicable Regulatory Requirements / Criteria

The proposed changes to delete SR 3.4.11.1 Note 3 and SR 3.4.11.4 are administrative and do not affect any regulatory requirements or criteria. These changes do not affect how plant equipment is operated or maintained and there are no changes to the physical plant or analytical methods. As a result, there are no impacts on the UFSAR accident analysis.

4.3 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 Environmental Consideration

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

Enclosure 2

Technical Specifications Marked-up Pages

ACTIONS

	CONDITION	R	EQUIRED ACTION	COMPLETION TIME
F.	More than one block valve inoperable.	F.1 .	Place associated PORVs in manual control.	1 hour
		AND		
		F.2	Restore one block valve to OPERABLE status.	2 hours
		AND		
		F.3	Restore remaining block valve to OPERABLE status.	72 hours
G.	Required Action and associated Completion Time of Condition F not	G.1	Be in MODE 3.	6 hours
		AND		
	met.	G.2	Be in MODE 4.	12 hours

SURVEILLANCE REQUIREMENTS

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	SURVEILLANCE	FREQUENCY
SR 3.4.11.1	 Not required to be met with block valve closed in accordance with the Required Action of Condition B or E. Not required to be performed prior to entry into MODE 3. 	
Delete SR 3.4.11.1 Note 3	Not required to be performed for Unit 2 for the remainder of operating cycle 16 for block valve Q2B31MOV8000B. Perform a complete cycle of each block valve.	In accordance with the Surveillance Frequency Control Program

Amendment No. 185 (Unit 1) Amendment No. 480 (Unit 2)

SURVEILLANCE REQUIREMENTS

		FREQUENCY	
	SR 3.4.11.2	Not required to be performed prior to entry into MODE 3.	
		Perform a complete cycle of each PORV during MODE 3 or 4.	In accordance with the Surveillance Frequency Control Program
	SR 3.4.11.3	Perform a complete cycle of each PORV using the backup PORV control system.	In accordance with the Surveillance Frequency Control Program
	SR 3.4.11.4	NOTE	
		Required to be performed only for Unit 2 for the remainder of operating cycle 16.	
Dele	ete SR 3.4.11.4		
_		Check power available to the Unit Two PORV block valve Q2B31MOV8000B.	24 hours

Enclosure 3

Technical Specifications Clean Typed Pages

ACTIONS

	CONDITION	R	REQUIRED ACTION	COMPLETION TIME
F.	More than one block valve inoperable.	F.1	Place associated PORVs in manual control.	1 hour
		<u>AND</u>		
		F.2	Restore one block valve to OPERABLE status.	2 hours
		AND		
		F.3	Restore remaining block valve to OPERABLE status.	72 hours
G.	Required Action and	G.1	Be in MODE 3.	6 hours
	associated Completion Time of Condition F not	AND		
	met.	G.2	Be in MODE 4.	12 hours

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.4.11.1	Not required to be met with block valve closed in accordance with the Required Action of Condition B or E. Not required to be performed prior to entry into MODE 3.	
	Perform a complete cycle of each block valve.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.4.11.2	Not required to be performed prior to entry into MODE 3.	
	Perform a complete cycle of each PORV during MODE 3 or 4.	In accordance with the Surveillance Frequency Control Program
SR 3.4.11.3	Perform a complete cycle of each PORV using the backup PORV control system.	In accordance with the Surveillance Frequency Control Program

Enclosure 4

Technical Specifications Bases Marked-up Pages (For Information Only)

BASES

ACTIONS (continued)

G.1 and G.2

If the Required Actions of Condition F are not met, then 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 4 within 12 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. In MODES 4, 5, and 6, the PORVs are not required OPERABLE.

SURVEILLANCE REQUIREMENTS

SR 3.4.11.1

Block valve cycling verifies that the valve(s) can be closed if needed. The basis for the Frequency of 92 days is the ASME Code, Section XI (Ref. 3). If the block valve is closed to isolate a PORV that is capable of being manually cycled, the OPERABILITY of the block valve is of importance, because opening the block valve is necessary to permit the PORV to be used for manual control of reactor pressure. If the block valve is closed to isolate an otherwise inoperable PORV, the maximum Completion Time to restore the PORV and open the block valve is 72 hours, which is well within the allowable limits (25%) to extend the block valve Frequency of 92 days. Furthermore, these test requirements would be completed by the reopening of a recently closed block valve upon restoration of the PORV to OPERABLE status (i.e., completion of the Required Actions fulfills the SR).

This SR is modified by two Notes. Note 1 modifies this SR by stating that it is not required to be met with the block valve closed, in accordance with the Required Action of this LCO. Note 2 modifies this SR to allow entry into and operation in MODE 3 prior to performing the SR. This allows the test to be performed in MODE 3 under operating temperature conditions, prior to entering MODE 1 or 2. A temporary third note has been added to suspend SR 3.4.11.1 for Unit Two PORV block valve Q2B31MOV8000B for the remainder of operating cycle 16.

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SR 3.4.11.2

SR 3.4.11.2 requires a complete cycle of each PORV in MODE 3 or 4. The PORVs are stroke tested during MODES 3 or 4 with the associated block valves closed in order to limit the uncertainty introduced by testing the PORVs at lesser system temperatures than expected during actual operating conditions. Operating a PORV through one complete cycle ensures that the PORV can be manually actuated for mitigation of an SGTR. The Frequency of 18 months is based on a typical refueling cycle and industry accepted practice. The Note modifies this SR to allow entry into and operation in MODE 3 prior to performing the SR. This allows the test to be performed in MODE 3 under operating temperature conditions, prior to entering MODE 1 or 2.

SR 3.4.11.3

SR 3.4.11.3 requires a complete cycle of each PORV using the backup PORV control system. This surveillance verifies the capability to operate the PORVs using the backup air and nitrogen supply systems. Additionally, this surveillance ensures the correct function of the associated air and nitrogen supply system valves. The 18-month Frequency is based on a typical refueling cycle and industry accepted practice for Surveillances requiring the PORVs to be cycled.

SR 3.4.11.4

SR 3.4.11.4 applies only to Unit 2 for the remainder of cycle 16 for PORV block valve Q2B31MOV8000B. It requires that power to the PORV block valve is checked to be available at least every 24 hours. This surveillance provides additional assurance that the PORV block valve could be stroked if demanded while SR 3.4.11.1 is suspended.

REFERENCES

- 1. Regulatory Guide 1.32, February 1977.
- 2. FSAR Sections 5.5 and 15.2.
- 3. ASME, Boiler and Pressure Vessel Code, Section XI.