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Docket Nos.: 50-348  
50-364

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

Joseph M. Farley Nuclear Plant  
Withdrawal of Request for Technical Specification Changes  
Deletion of LCO 3.6.1, Condition A and  
Addition of LCO 3.0.8, Inoperability of Non-Technical Specification Support Systems

Ladies and Gentlemen:

On December 26, 2001, Southern Nuclear Operating Company (SNC) submitted a proposed amendment to the Farley Nuclear Plant (FNP) Technical Specifications (TS), Appendix A to Operating License(s) NPF-2 and NPF-8. This TS amendment would add a new LCO 3.0.8, based on TSTF-372, Rev. 0. If approved, this change would allow a delay time, consistent with the delay time that existed prior to the conversion to the Improved Technical Specifications (ITS), before entering a TS Limiting Condition for Operation (LCO) for a supported system. Adoption of the proposed LCO 3.0.8 would also eliminate the need for LCO 3.6.1, Condition A, which the proposed change would delete.

As part of the conversion to the ITS, the former TS requirements for snubbers and many other support systems were relocated to the Technical Requirements Manual (TRM) or other licensee controlled documents based on the fact that the TS requirements did not meet any of the four criteria of 10 CFR 50.36(c)(2)(ii) for inclusion in the ITS. The removal of these requirements from the TS was classified as a relocation as opposed to a more restrictive or less restrictive change. The NRC approved the relocation without restriction. Therefore, it was intended that when a non-TS support system (e.g., a snubber) could not perform the required safety function(s) for a system that is required to be OPERABLE by the TS, the licensee controlled document requirements (e.g., TRM) for the support system would be invoked before the system TS LCO would become applicable. Should the actions of the licensee controlled document requirements for the support system not be completed within the allocated time, the supported system would be declared inoperable and the Conditions and Required Actions of the TS LCO for that system followed. Subsequent to ITS implementation, the NRC has challenged this position making clarification necessary.

The Industry is currently working with the NRC to resolve this issue for snubbers, resulting in subsequent proposed revisions to TSTF-372. Therefore, in accordance

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with the NRC request, SNC withdraws this amendment request until a resolution is reached between the NRC and the Industry for snubbers. At that time, SNC will determine what course of action will be taken to address the issue of snubbers as well as other support systems outside of TS for FNP.

Mr. J. B. Beasley, Jr. states he is a Vice President 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 advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

  
J. B. Beasley, Jr.

Sworn to and subscribed before me this 18<sup>th</sup> day of August, 2003.

  
Notary Public

My commission expires: 06/07/05

JBB/WAS/sdl

cc: Southern Nuclear Operating Company  
Mr. J. D. Woodard, Executive Vice President  
Mr. D. E. Grissette, General Manager – Plant Farley  
Document Services RTYPE: CFA04.054; LC# 13810

U. S. Nuclear Regulatory Commission  
Mr. L. A. Reyes, Regional Administrator  
Mr. F. Rinaldi, NRR Project Manager – Farley  
Mr. T. P. Johnson, Senior Resident Inspector – Farley

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