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November 30, 2004

Docket Nos.: 50-348
50-364

NL-04-2306

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

Joseph M. Farley Nuclear Plant Units 1 and 2
SNC Comments - Draft Safety Evaluation Report Related to the License
Renewal of the Joseph M. Farley Nuclear Plant, Units 1 and 2

Ladies and Gentlemen:

SNC has completed its review of the "Draft Safety Evaluation Report Related to the License Renewal of the Joseph M. Farley Nuclear Plant, Units 1 and 2," issued by the NRC staff in October, 2004. SNC comments on this report are provided in the enclosure to this letter.

Mr. L. M. Stinson 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.

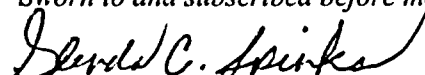
If you have any questions, please contact Charles Pierce at 205-992-7872.

Respectfully submitted,

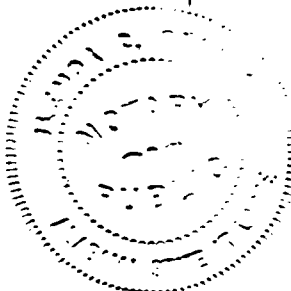
SOUTHERN NUCLEAR OPERATING COMPANY


L. M. Stinson

Sworn to and subscribed before me this 30th day of November, 2004.


Notary Public

My commission expires: 11/10/06



A099

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LMS/JAM/slb

Enclosure: SNC Comments -
Draft Safety Evaluation Report Related to the License Renewal of
Joseph M. Farley Nuclear Plant, Units 1 and 2

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President
Mr. J. R. Johnson, General Manager – Plant Farley
Document Services RTYPE: CFA04.054; LC# 14176

U. S. Nuclear Regulatory Commission
Ms. K. A. Corp, License Renewal Project Manager
Dr. W. D. Travers, Regional Administrator
Mr. S. E. Peters, NRR Project Manager – Farley
Mr. C. A. Patterson, Senior Resident Inspector – Farley

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

ENCLOSURE

SNC Comments

**Draft Safety Evaluation Report Related to the License Renewal of the
Joseph M. Farley Nuclear Plant, Units 1 and 2**

SNC Comments
Draft Safety Evaluation Report related to the License Renewal of the
Joseph M. Farley Nuclear Plant, Units 1 and 2

Page 1-4, line 30. Delete the word "fully."

Page 1-6, lines 23 and 24. Delete "...and is still under staff review."

Page 1-9, lines 23 and 24. Modify as follows: "The second license condition requires that the future activities identified in the UFSAR Supplement be completed in accordance with the schedule in the UFSAR Supplement."

Page 2-9, line 21. Modify as follows: "(4) The scoping results were reviewed by an independent expert committee..."

Page 2-9, line 25. Change "assessments of the LRA..." to "assessments of the process to develop the LRA..."

Page 2-12, line 30. Modify as follows: "If this evaluation found a potential adverse effect..."

Page 2-18, line 26. Delete the sentence beginning with "Following identification...." Move the last sentence of the paragraph, which begins with "System components meeting..." to the end of line 22, after the sentence which ends with "...process and instrumentation diagrams (P&IDs)."

Page 2-20, line 41. Change "I&C guidance" to "reviews." Change the sentence beginning with "The procedure identified the component..." to "The procedure describes the process to identify the component..."

Page 2-21, line 15. Change "needed to operate" to "credited in the CLB with supporting..."

Page 2-22, lines 20 through 25. Rearrange and change as follows: "For mechanical components, the applicant first established evaluation boundaries for the various plant mechanical systems, as described in Section 2.1.3.1.3 of this SER. The applicant then applied a screening process to each mechanical system in order to determine the types of mechanical components and commodities within the systems which are subject to an AMR, and the various materials and environments to be considered in the AMR."

Page 2-24, lines 34 and 35. Modify as follows: "The applicant classified components as safety related if they could prevent or adversely affect a function that meets the criterion of 10 CFR 54.4(a)(1), rather than non safety-related per 10 CFR 54.4 (a)(2)."

Page 2-35, line 10. The date of the referenced RAI Response letter should be June 18, 2004.

Page 2-44, line 36. Add "pressurizer support lugs" to the listing of component types.

Page 2-47, line 30. Change "The applicant defined..." to "The FNP UFSAR defined..."

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Page 2-47, line 37. Add this sentence: "For the purpose of license renewal, the applicant also included the containment isolation system in the ESF section of the LRA."

Page 2-54, line 36. Modify as follows: "...the applicant listed the Auxiliary Building component types, which include the new fuel storage component types, that are..."

Page 2-55, line 33. Modify as follows: "...the applicant listed the Auxiliary Building component types, which include the spent fuel storage component types, that are..."

Page 2-61, line 20. Change "cooler crane..." to "polar crane..."

Page 2-68, line 15. Modify as follows: "channel side of the RCDT heat exchanger does *not* come in contact with the CCW...." (emphasis added)

Page 2-70, line 2. Change "in RAI 2.3.3.6-3 are..." to "in RAI 2.0-2I (D-RAI 2.3.3.6-3) are..."

Page 2-70, lines 6 and 7. Change "excluded from the scope of license renewal." to "not in the scope of mechanical components for license renewal."

Page 2-71, line 7. Delete "...used in the recirculation mode."

Page 2-80, line 14. Modify as follows: "...dampers in this system bring portions of the system..."

Page 2-88, line 19. The paragraph needs to say that SNC does not credit halon in these areas. For rooms 235 and 2235, SNC credits the hose stations, and for rooms 201 and 2201, SNC credits CO₂ hose reels.

Page 2-129, line 13. The date of the referenced RAI response letter should be June 18, 2004.

Page 3-17, line 16. Change "provides high level guidance for establishing programs to detect" to "provides for detecting."

Page 3-17, line 29. Delete "with quatrefoil broached holes." (This information was not provided in the FNP LRA.)

Page 3-17, line 35. This information was not provided in the FNP LRA. Delete the entire paragraph beginning at line 35.

Page 3-29, line 35. Capsule W data was reported in WCAP – 14196.

Page 3-33, line 7. "ASTM D270-75" should be "ASTM D270-65."

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Page 3-37, line 5. Change "...compressor and the service water pump columns." to "...compressor credited for Appendix R safe shutdown and the inspection of the service water pump columns."

Page 3-50, line 8. Change "Non-EQ Cables Program" to "Non-EQ Electrical Cables Used in Instrumentation Circuits"

Page 3-50, line 12. Modify as follows: "that the program for non-EQ electrical cables used in instrumentation circuits is consistent..."

Page 3-50, line 19. Modify as follows: "The applicant considered ISG-5 in preparation of this new program. (Note: ISG-5 should have been ISG-15 as discussed under the Staff Evaluation section.)"

Page 3-56, line 28. Modify as follows: "...program element in that, additionally, any significant loss of material in piping will also be reported..."

Page 3-64, line 10. Change "...once every three years..." to "...once every three cycles..."

Page 3-68, line 18. Modify as follows: "...at FNP, Units 1 and 2, prior to the period of extended operation."

Page 3-68, line 28. Change "elastomer flexible hoses used in the oil-static cable pressurization system." to "elastomers." (Elastomers in other systems have been added to the program. See discussion of RAI 3.3-6 in Section 3.3.2.3.0 of this D-SER.)

Page 3-72, line 39. Modify as follows: "... (which are specifically addressed by the Steam Generator Program) and reactor vessel internals (which are specifically addressed by the Reactor Vessel Internals Program)."

Page 3-73, line 33. Delete the last sentence of this paragraph. The Program Scope addresses all of the NiCrFe locations identified in the NRC BLs and EA-03-009.

Page 3-75, lines 7 through 19. Delete these 3 paragraphs for consistency with the other program evaluations. These 3 elements are discussed in Section 3.0.4.

Page 3-77, line 5. Change "Alloy 600" to "NiCrFe."

Page 3-85, lines 3 through 13. Delete this paragraph. This information was not provided in Section A.2.1 of the LRA and is addressed in Section 3.0.4.2 of this D-SER.

Page 3-87, line 32. Modify as follows: "The applicant conducts ongoing review of plant-specific and industry operating experience in accordance with the plant operating experience program."

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Page 3-91, lines 16 through 20. The Staff evaluation for Item 3.1.1-21 should state that, "This line item is not applicable to FNP. (See Section 3.1.2.2.14 of this D-SER)."

Page 3-102, lines 5 and 6. Re-write the sentence as follows: "In 1998/1999, the applicant replaced a number of baffle/former bolts with bolts of an improved design."

Page 3-105, line 30. Change "and the pressurizer surge line nozzle" to "and CASS pressurizer surge line nozzles."

Page 3-107, line 2. Delete "and the pressurizer surge line nozzle." Surge line nozzles are not CASS and therefore not applicable to this write-up.

Page 3-127, line 10. Modify as follows: "loss of material in the in-core flux thimble tubes, internals hold-down spring, clevis inserts and fasteners, upper core plate alignment pins, and the radial support keys and fasteners,..."

Page 3-134, line 7. Delete the sentence beginning "Table 3.1.1, Item 3.1.1-12, omits..."

Page 3-134, lines 5 through 13. After making the above modification, the entire section beginning with "Commodity group IV.C.2.5.4 of..." and ending with "spray head assembly through the TLAA." should be moved to Section 3.1.2.2.1.

Page 3-135, lines 18 through 25. Re-write as follows: "The staff has determined that the applicant has provided an acceptable basis for managing loss of material in RCS Class 1 piping and fitting components fabricated from Alloy 82/182 welds, stainless steel, and CASS under internal exposure to the borated water environment. The staff concludes that the applicant proposed acceptable AMPs for managing the loss of material as a result of crevice corrosion and pitting corrosion in the stainless steel and NiCrFe components listed in Table 3.1.2-3."

Page 3-135, lines 32 through 36. Delete this paragraph. Cracking is not the subject of this section. This was also evaluated as consistent with GALL. If the staff wants to keep the paragraph it could be moved to Section 3.1.2.2.7.

Page 3-138, line 9. Change "Loss of Material" to "Aging Effects."

Page 3-138, line 27. Delete this line. "Cracking (ODSCC) was identified as an aging effect requiring management for the RCP thermal barrier CCW nozzles based on plant-specific operating experience."

Page 3-147, lines 7 through 12. Delete this paragraph (it duplicates the intent of Section 3.1.3).

Page 3-147, line 20. Modify as follows: "...reactor vessel internals, RCS components, and steam generators will..."

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General Comment (clarification) for Sections 3.2.2.3.X; 3.3.2.3.X; and 3.4.2.3.X. Under Aging Effects, modify as follows: "For these component types, the applicant identified the following materials, environments, and AERMs that do not rely on the GALL report for the AMR."

Page 3-152, line 32. Change "...containment spray..." to "...containment isolation..."

Page 3-155, lines 9 and 10. Modify as follows: "The one-time inspection will be performed on a bounding CVCS letdown orifice or charging/SI pump miniflow orifice, which would..."

Page 3-156, lines 27 and 28. Delete. This was evaluated as consistent with GALL and is therefore addressed in Section 3.2.2.1 and/or 3.2.2.2.

Page 3-156, lines 31 and 32. Delete. This is not applicable to the containment spray system.

Page 3-158, line 30. Delete. This is not applicable to the containment isolation system.

Page 3-158, lines 1 through 5. Delete this paragraph. This is not applicable to the containment isolation system.

Page 3-161, line 28. Add this bullet: "Cast iron high head safety injection oil cooler channel heads exposed to a CCCW environment are subject to the aging effect of loss of material."

Page 3-184, lines 7 and 8. Delete "...of loss of materials for diesel fuel oil tanks in the diesel fuel oil system."

Page 3-238, line 35. Add "sprinkler head bulbs" to the listing of components.

Page 3-268, lines 29 through 30. Delete "..., pending satisfactory resolutions of the RAIs,"

Page 3-298, lines 15 through 22. Modify as follows: "In response to RAI 3.4-7, the applicant stated that the exterior bottom surfaces of the auxiliary steam condensate tanks and condensate return unit tanks are accessible for visual inspection." The CST is discussed in D-SER Section 3.4.2.3.4 (AFW System).

Page 3-352, lines 3 and 4. Modify as follows: "...Appendix B.5.6, "Non-EQ Cable Program," includes the insulated cable portion of the metal enclosed cable bus."

Page 4-1, lines 20 and 21. Modify as follows: "...final safety analysis report (FSAR) and docketed correspondence. The applicant also reviewed design calculations..."

Page 4-9, line 31. Change 186.4 °F to 191 °F.

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Page 4-16, line 8. Modify as follows: "...Table 4.3.1, "Class 1 Thermal Fatigue Cycles," of the LRA lists the FNP FSAR transients..."

Page 4-16, line 40. Modify as follows: "...60 years of plant operation for significant transients..."

Page 4-28. Table is missing two entries. Add these lines:

Year	Tendon	No of Wires	Actual Force (kips)
5.5	H39AB	164	1130.0
22.5	H42CA	170	1242.7

Page 4-29 line 20. Replace "with the following table:" with "The minimum required prestressing forces for the vertical, hoop, and dome tendons (kip/wire) are 6.81, 6.01, and 6.35, respectively." SNC did not commit to add the table to the FSAR supplement. SNC committed to revise the FSAR Supplement (App. A) to include the last sentence of the response to RAI 4.3.4-1b, letter NL-04-0318, March 5, 2004, page E-40. The table was provided for information only; the commitment was to include the minimum required value for each tendon type.

Page A-8, Item 10 is missing a line item – "A bounding CVCS letdown orifice or charging/SI pump miniflow orifice (based on pressure drop)."

Page B-2, line 26. A letter is missing – NL-04-0069 dated February 20, 2004.

Page B-5, line 11. A letter is missing – NL-04-0924 dated May 28, 2004.

Page B-6, line 4. A letter is missing – NL-04-1218 dated July 9, 2004.

Page B-6, line 9. A letter is missing – NL-04-1296 dated July 16, 2004.

Page C-1, line 8. For RAI 2.3.2.2-3, change March 2 to February 13 and March 31 to March 12.

Page C-1, line 9. For RAI 2.3.1.2-1, change March 2 to February 13 and March 31 to March 12.

Page C-3, line 1. Change RAI 2.3.3.8-1 to RAI 2.0-1. RAI 2.3.3.8-1 became C & C and was answered in RAI 2.0-1.

Page E-3, line 32. Delete reference to NEI 95-10, Revision 2. (This reference is not applicable to the FNP LRA).