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U. S. Nuclear Regulatory Commission  
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**Joseph M. Farley Nuclear Plant – Units 1 and 2**  
**License Renewal Commitment Item 11**

Ladies and Gentlemen:

Commitment Item No. 11 of NUREG-1825, Safety Evaluation Report Related to the License Renewal of the Joseph M. Farley Nuclear Plant, Units 1 and 2, requires the submission of an inspection plan for the NiCrFe Component Assessment Program (now called the Nickel Alloy Program) at least 24 months prior to entering the periods of extended operation for the Farley Nuclear Plant (FNP) units. The period of extended operation for FNP, Unit 1 begins on June 25, 2017. Since establishing this commitment, the industry and Nuclear Regulatory Commission (NRC) have adopted a strategy to proceed with a generic approach through the consensus process provided by the American Society of Mechanical Engineers (ASME) Code Section XI. Thus, the nickel-based alloy inspection program is based on industry consensus prescribed in ASME Code Cases N-722-1, N-729-1 and N-770-1 as mandated and conditioned in 10 CFR 50.55a.

This Nickel Alloy pressure boundary program has been fully incorporated into the FNP Inservice Inspection program, is being conducted accordingly and has undergone periodic review by Region II inspectors. Southern Nuclear Operating Company, Inc. (SNC) believes that there is not a need for additional staff review and approval of the technical details and/or basis for the FNP Units 1 and 2 plant-specific inspection plans because the technical basis for the scope, periodicity, nondestructive examination requirements, and acceptance criteria are all now generically approved and mandated via rulemaking.

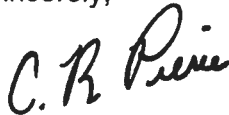
When the FNP license renewal application was submitted, NUREG-1801, Generic Aging Lessons Learned (GALL) Report, Revision 0 was the approved version. Since then, more recent versions of the GALL and the Aging Management Program (AMP) for management of nickel alloys (now XI.M11B) have been issued. The most recent GALL and AMP requirements have been reviewed, and FNP is in compliance. A FSAR chapter 18 update will be processed to reflect the incorporation of all the necessary aging management items for nickel chrome alloys into the ISI AMP.

Additionally, FNP has compared its plant-specific configuration in response to recent industry experience where certain nickel alloy branch connections in the reactor coolant system (RCS) were excluded from the scope of Code Case N-770-1 examination. SNC determined that no similar configurations exist in either FNP RCS. Therefore, the only alloy locations not directly under the augmented requirements of one of the mandated code cases are the internal reactor vessel lug attachment welds, which are managed per ASME Code Section XI Category B-N-2 and augmented by an owner-elected additional measure of visual VT-1.

SNC believes that this notification effectively fulfills the intent of commitment item 11 contained in NUREG-1825, which was established prior to staff rulemaking on the generic ASME Code Case requirements.

This letter contains no new NRC commitments. If you have any questions, please contact Ken McElroy at (205) 992-7369.

Sincerely,



C.R. Pierce  
Regulatory Affairs Director

CRP/JMC/lac

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