UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

March 18, 2016

Mrs. Cheryl A. Gayheart
Vice President Nuclear Plant Site
Southern Nuclear Operating Co., Inc.
Joseph M. Farley Nuclear Plant
7388 North State Highway 95
Columbia, AL 36319

SUBJECT: FARLEY NUCLEAR PLANT – U.S. NUCLEAR REGUALTORY COMMISSION EVALUATION OF CHANGES, TESTS, AND EXPERIMENTS AND PERMANENT PLANT MODIFICATIONS INSPECTION REPORT 05000348/2016007 AND 05000364/2016007

Dear Mrs. Gayheart:

On February 4, 2016, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Farley Nuclear Plant, Units 1 and 2, and discussed the results of this inspection with Mr. R. Hruby, Jr. and other members of your staff. Inspectors documented the results of this inspection in the enclosed inspection report (IR).

NRC inspectors documented one finding of very low safety significance (Green) in this report. The finding involved a violation of NRC requirements. The NRC is treating this violation as a non-cited violation (NCV) consistent with Section 2.3.2.a of the Enforcement Policy.

If you contest the violation or significance of this NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001; with copies to the Regional Administrator, Region II; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC resident inspector at the Farley Nuclear Plant.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public inspections, exemptions, requests for withholding" of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, and its Enclosure, will be available electronically for public inspection in the NRC Public Document Room, or from the Publicly Available Records (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS);

accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

/RA/

Jonathan H. Bartley, Chief
Engineering Branch 1
Division of Reactor Safety

Docket Nos. 50-348 and 50-364
License Nos. NPF-2 and NPF-8

Enclosure:
NRC IR 05000348 and 364/2016007
w/Attachment: Supplementary Information

cc: Distribution via Listserv

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ADAMS: ☒ Yes ACCESSION NUMBER:________________________ ☒ SUNSI REVIEW COMPLETE ☐ FORM 665 ATTACHED

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NAME	RPATTERSON	SHERRICK	TSU	JBARTLEY	SSANDAL		
DATE	3/ 17/ 2016	3/17/2016	3/17/2016	`3/18/2016	3/18/2016	3/ /2016	3/ /2016
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

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Letter to Cheryl Gayheart from Jonathan Bartley dated March 18, 2016.

SUBJECT: FARLEY NUCLEAR PLANT – U.S. NUCLEAR REGUALTORY COMMISSION EVALUATION OF CHANGES, TESTS, AND EXPERIMENTS AND PERMANENT PLANT MODIFICATIONS INSPECTION REPORT 05000348/2016007 AND 05000364/2016007

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U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket Nos:	50-348 and 50-364
License Nos:	NPF-2 and NPF-8
Report Nos:	05000348/2016007 and 05000364/2016007
Licensee:	Southern Nuclear Operating Company, Inc.
Facility:	Farley Nuclear Plant, Units 1 and 2
Location:	Columbia, AL
Dates:	January 11, 2016, through February 4, 2016
Inspectors:	Robert N. Patterson, Acting Senior Reactor Inspector (Team Leader) Sandra Herrick, Reactor Inspector Teh-Chiun Su, Reactor Inspector
Approved by:	Jonathan H. Bartley, Chief Engineering Branch 1 Division of Reactor Safety

SUMMARY

Inspection Report (IR) 05000348/2016007 and 05000364/2016007; 1/11/2016 – 2/4/2016; Farley Nuclear Plant, Units 1 and 2; Evaluations of Changes, Tests, and Experiments and Permanent Plant Modifications

This report covers a 2-week onsite inspection by one senior reactor inspector (acting) and two reactor inspectors. One Green non-cited violation (NCV) was identified. The significance of inspection findings is indicated by their color (Green, White, Yellow, Red) using the NRC Inspection Manual Chapter (IMC) 0609, "Significance Determination Process," dated April 29, 2015. All violations of NRC requirements are dispositioned in accordance with the NRC's Enforcement Policy, dated February 4, 2015. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 5, dated February 2014.

A. NRC-Identified and Self-Revealing Findings

Cornerstone: Mitigating Systems

Green. The NRC identified a non-cited violation (NCV) of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," for failure to verify design assumptions associated with the operation of the atmospheric relief valves (ARVs) following a steam generator tube rupture (SGTR). The licensee failed to verify that all credited methods of ARV operation as specified in procedure FNP-1-EEP-3, "Steam Generator Tube Rupture," Rev. 27 could be performed within the FSAR specified time limit of 30 minutes. Upon identification of the issue, the licensee initiated Technical Evaluation 952125 and conducted two simulated scenarios using the two credited means of operating the ARVs following a SGTR. The licensee was able to show that the actions could be performed within the specified time, although the time results were marginal and did not account for operator error or repeatability. This issue has been entered into the licensee's corrective action program as CR 10193323.

The performance deficiency was more than minor because it was associated with the Design Control attribute of the Mitigating Systems Cornerstone and affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The finding was not greater than green because it affected the design or qualification of a mitigating structure, system, or component (SSC), but the SSC maintained its operability or functionality as documented in CR 10193323. This finding was not assigned a cross-cutting aspect because the issue did not reflect current licensee performance. (Section 1R17.b)

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REPORT DETAILS

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity

1R17 Evaluations of Changes, Tests, Experiments and Permanent Plant Modifications (71111.17T)

a. Inspection Scope

Evaluations of Changes, Tests, and Experiments: The team reviewed six safety evaluations performed pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.59, "Changes, tests, and experiments," to determine if the evaluations were adequate, and that prior NRC approval was obtained as appropriate. The team also reviewed 16 screenings where licensee personnel had determined that a 10 CFR 50.59 evaluation was not necessary. The team reviewed these documents to determine if:

- the changes, tests, or experiments performed were evaluated in accordance with 10 CFR 50.59, and that sufficient documentation existed to confirm that a license amendment was not required
- the safety issues requiring the changes, tests, or experiments were resolved
- the licensee conclusions for evaluations of changes, tests, or experiments were correct and consistent with 10 CFR 50.59
- the design and licensing basis documentation used to support the change was updated to reflect the change

The team used, in part, Nuclear Energy Institute (NEI) 96-07, "Guidelines for 10 CFR 50.59 Implementation," Rev. 1, to determine acceptability of the completed evaluations and screenings. The NEI document was endorsed by the NRC in Regulatory Guide 1.187, "Guidance for Implementation of 10 CFR 50.59, Changes, Tests, and Experiments," dated November 2000.

Permanent Plant Modifications: The team reviewed six permanent plant modifications that had been installed in the plant during the last 3 years. The modifications reviewed are listed below:

- SNC86713 TDAFWP UPS Replacement
- SNC87850 2C EDG Governor Replacement
- SNC459692 NFPA 805: U1 Alternate Air Supply to MDAFWP Control Valve
- SNC524957 Addition of Auto Isolation Valves For RWST TO RWPP
- SNC582588 UNIT 2 RCP SDS Generation III Replacement
- SNC731742 UNIT 1 Low Idle Set-point Change For TDAFWP

The modifications were selected based upon risk significance, safety significance, and complexity. The team reviewed the modifications selected to determine if:

- the supporting design and licensing basis documentation was updated
- the changes were in accordance with the specified design requirements
- the procedures and training plans affected by the modification had been adequately updated
- the test documentation, as required by the applicable test programs, had been updated
- post-modification testing adequately verified system operability and/or functionality

The team also used applicable industry standards to evaluate acceptability of the modifications and performed walkdowns of accessible portions of the modifications. Documents reviewed are listed in the Attachment.

b. Findings

Failure to Verify Design Assumptions Associated With the Operation of the Atmospheric Relief Valves (ARVs)

Introduction: An NRC-identified Green non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," was identified for the licensee's failure to verify a design assumption associated with the operation of the atmospheric relief valves (ARVs) following a steam generator tube rupture (SGTR). Specifically, the licensee failed to verify that a SGTR could be mitigated with the credited methods of ARV operation within the FSAR time limit of 30 minutes.

Description: During review of modification package SNC459692, "NFPA 805: U1 Alternate Air Supply to MDAFWP Control," the team identified that the licensee had not verified that a steam generator tube rupture could be mitigated using the credited methods of operating the ARVs.

FSAR Section 15.4.3.2.1 specified "The operator identifies the accident type and terminates break flow to the affected steam generator within 30 min of accident initiation." The team reviewed licensing and design bases documentation provided by the licensee and concluded that the two credited means for operating the ARVs include motive force provided by the emergency air compressors (EACs), or the local hand wheels. During further review, it was identified that the licensee had never verified that break flow could be terminated via either of these two methods within 30 minutes. Procedure FNP-1-EEP-3, "Steam Generator Tube Rupture," Rev. 27, directed operators to use either method to terminate the break flow from the RCS. The licensee had Job Performance Measures (JPMs) for operating the ARVs using the EAC and the local hand wheels; however, these JPMs did not demonstrate that the actions could be accomplished within required time frame. In addition, these actions were not incorporated into the site's time critical operator actions program.

In response to the team's questioning, the licensee initiated corrective actions to further evaluate the site's ability to respond to a SGTR event and provide the team with reasonable assurance of operability. To support operability, the licensee conducted two simulated scenarios using the two credited means of operating the ARVs following a

SGTR. The licensee was able to show that the actions could be performed within the specified time. Additionally, on March 3, 2016, the licensee initiated Technical Evaluation 952125 to revise the Time Critical Operator Action Program (NMP-ES-014-001) to update the Operator Response Time Initial Validation Sheet to include actions associated with the EAC and ARV hand wheel operation.

Analysis: The licensee's failure to verify that all credited methods of ARV operation as specified in procedure FNP-1-EEP-3, "Steam Generator Tube Rupture," Rev. 27, could be performed within the FSAR time limit of 30 minutes was a performance deficiency. The performance deficiency was more than minor because it was associated with the Design Control attribute of the Mitigating Systems Cornerstone and adversely affected the cornerstone objective in that failure to verify that a SGTR could be terminated within 30 minutes using the credited methods of operating the ARVs adversely affected the capability to mitigate a STGR event. The team used IMC 0609, Att. 4, "Initial Characterization of Findings," issued June 19, 2012, for Mitigating Systems, and IMC 0609, App. A, "The Significance Determination Process (SDP) for Findings At-Power," issued June 19, 2012, and determined the finding to be of very low safety significance (Green) because the finding was a deficiency affecting the design or qualification of a mitigating structure, system, or component (SSC), and the SSC maintained its operability or functionality. This finding was not assigned a cross-cutting aspect because the issue did not reflect current licensee performance.

Enforcement: 10 CFR Part 50, Appendix B, Criterion III, "Design Control," required, in part, that design control measures shall provide for verifying or checking the adequacy of design. Licensee procedure NMP-ES-084, "Design Control/Configuration Management Processes," implemented the requirements of Section 3, "Design Control" in the SNC-1, "Quality Assurance Topical Report (QATR)." Section 3 of the licensee's QATR implemented the requirements of Criterion III and specified that "design verification procedures are established and implemented to assure that an appropriate verification method is used, the appropriate design parameters to be verified are chosen, the acceptance criteria are identified, and the verification is satisfactorily accomplished and documented." Contrary to the above, since the operating licenses were issued in December, 1977, for Unit 1 and July, 1981, for Unit 2, the licensee failed to establish design control measures to provide for verifying or checking verify design assumptions associated with the operation of the ARVs following a steam generator tube rupture event. Specifically, the licensee failed to verify that all credited methods of ARV operation as specified in procedure FNP-1-EEP-3, "Steam Generator Tube Rupture," Rev. 27, could be performed within the FSAR time limit of 30 minutes. Because this violation was of very low safety significance (Green), and was entered into the licensee's corrective action program, this violation is being treated as an NCV, consistent with Section 2.3.2 of the NRC Enforcement Policy. The violation was entered into the licensee's corrective action program as CR 10193323. (NCV 05000348/ 2016007-01 and 05000364/2016007-01, Failure to Verify Design Assumptions Associated with the Operation of the Atmospheric Relief Valves)

4OA6 Meetings, Including Exit

On March 15, 2016, the team presented the inspection results to Ms. Gayheart and other members of the licensee's staff. The team verified that no proprietary information was retained by the inspectors, or documented in this report.

ATTACHMENT: SUPPLEMENTARY INFORMATION

SUPPLEMENTARY INFORMATION

KEY POINTS OF CONTACT

Licensee personnel:
R. Hruby, Engineering Director
J. Andrews, Maintenance Director
R. Still, RP Superintendent of Operations
K. Baity, Site Design Manager
B. Taylor, Regulatory Affairs Manager
J. McCory, Design Supervisor
J. Collier, Licensing Engineer
J. Simmons, Design Engineer

NRC personnel:
S. Sandal, Chief, Division of Reactor Projects
P. Niebaum, Senior Resident Inspector, Division of Reactor Projects
K. Miller, Resident Inspector, Division of Reactor Projects

LIST OF DOCUMENTS REVIEWED

Licensing Documents
TS, Current
TRM, Current UFSAR, Current
SER and Supplements

10 CFR 50.59 Evaluations
SNC71706, SSPS Card Replacements U2 Phase I
SNC87850, 2C EDG Governor Replacement
SNC87848, 1-2A EDG Governor Replacement
SNC582588, UNIT 2 RCP SDS GEN III Replacement
SNC459698, NFPA 805: U1 125VDC Breaker Coordination
SNC524957, Addition of Auto Isolation Valves for RWST to RWPP

10 CFR 50.59 Screenings
DCP 1051571101(SNC50794), Replace Unit 1 Service Water Pumps
MDC 2091199901(SNC75408), 2C Charging Pump Casing Replacement
SNC538094, MDAFW Pumps (Q2N23P001A/B) Balancing Line Modification
SNC561065, CVCS Letdown Orifice "A" Replacement
SNC620460, Unit 1 Seal Injection Filter Isolation Valves Torque Plate Installation
SNC82835, Component Cooling Water (CCW) Non-Essential Header Isolation Valves (Q2P17HV3096A & Q2P17HV3096B)
SNC351984, Replace EDG Sync Switches, Ver. 2.0
SNC425348, 2C D/G Temperature Switch Replacements, Ver. 3.0
SNC534976, (SNC331671), U1 MDAFWP Handswitches (1B), Ver. 1.0
SNC335478, U1 TDAFWP UPS Replacement, Ver. 3.0
SNC471216, Remove 1-2A, 1B, 2B EDG Speed Signal GEN Alarm, Ver. 1.0
SNC367774, Circuit Protection on Unit 2 4kV GE BRK Control CKTS, Ver. 1.0
SNC378130, U1 TDAFWP Controller Start Relay, Ver. 2.0
SNC66497, Replace U1 CCW Isolation Valve HV3096A/B, Ver. 1.0
SNC612802, Replace the TDAFW Warm Up Line Check Valve, Ver. 1.0

Calculations
SM-C036019501-001, Verification of Emergency Air Compressor Size,
MC-F-12-0064, Unit 2 As-Built Load Study, Base Calculation, Ver. 6
MC-F-12-0068, Battery Capacity Calculation for TDAFW-UPS, Base Calculation Ver. 5
MC-F-12-0068, Steady State Diesel Generator Loading Calculation for LOSP, SI & SBO, Base Calculation Ver. 19
MC-F-12-0070, Appendix R – High Impedance Faults on Safe Shutdown & Associated Circuits, Base Calculation Ver. 9

Procedures
FNP-1-AOP-6, Loss of Instrument Air, Ver. 44
FNP-1-EEP-3, Steam Generator Tube Rupture, Rev. 27
NMP-ES-084, Design Control/Configuration Management Processes, Ver. 3.2
NMP-ES-084-001, Plant Modification and Configuration Change Processes, Ver. 4.6
NMP-OS-014-001, FNP Time Critical Operator Action Program, Ver. 3
FNP-0-EMP-1311 7, Farley Nuclear Plant 1C and 2C Diesel Generator 2301A Governor and Digital Reference Unit (DRU) Adjustment, Ver. 1
FNP-0-EMP-1311 9, Colt-Pielstick (1-2A, 1B & 2B) Diesel Governor Control Replacement, Set-up and Testing, Ver. 2
FNP-0-EMP-1313 1, Farley Nuclear Plant Electrical Maintenance Procedure, Ver. 16
FNP-0-SOP-38 -2C, Farley Nuclear Plant 2C Diesel Generator and Auxiliaries, Ver. 13.1
FNP-0-STP-80.17, Farley Nuclear Plant Diesel Generator 2C Operability Test, Ver. 42.1
FNP-1-AOP-6, Farley Nuclear Plant Abnormal Operating Procedure, Ver. 44
NMP-AP-002, SNC Fleet Procedures Writer's Guide, Ver. 7.1
NMP-ES-084-001, Plant Modification and Configuration Change Processes, Ver. 4.6
NMP-GM-008, Operating Experience Program, Ver. 16.1
SN9604-002, Electromagnetic Interference (EMI) Qualification Requirements for Southern Nuclear Power Plant Equipment, Ver. 2

Completed Procedures:
FNP-0-EMP-1311 5, Pre-calibration of the 2301A Load Sharing & Speed Control Unit and DRU for Fairbanks-Morse OP Engine, Ver. 4

Drawings
D-175007, P&ID – Aux. Feedwater System, Sht. 1, Ver. 35
D-175033, P&ID – Main Steam and Auxiliary Steam System, Sht. 1, Ver. 38
D-175033, P&ID – Main Steam and Auxiliary Steam System, Sht. 2, Ver. 26
D-175034, P&ID – Instrument Air, Sht. 1, Ver. 36
D-175034, P&ID – Instrument Air, Sht. 2, Ver. 18
D-175035, P&ID – Service Air, Sht. 1, Ver. 18
D-175035, P&ID – Service Air, Sht. 2, Ver. 11
D-175039, P&ID – Chemical and Volume Control System, Sht. 2, Ver. 41
D-175039, P&ID – Chemical and Volume Control System, Sht. 6, Ver. 12
20-003005 Ametek 100 Amp Battery Charger (Primary), Ver. B.
D-172794 Farley Nuclear Plant- Unit No. 1 Elem. Diag. Diesel No. 2C Exciter & Misc. Control, Ver. 14
D-207944 Farley Nuclear Plant- Unit No. 2 Single Line Diagram Turbine Driven Auxiliary Feedwater Pump UPS, Ver. 5

Miscellaneous Documents
A181010, Functional System Description Auxiliary Feedwater System, Ver. 36
A181012, Functional System Description Instrument Air System, Ver. 22
ANS N-18.2, Nuclear Safety Criteria for the Design of Stationary Pressurized Water Reactor Plants, August 1970 Draft, Issued November 1970
Docket No. 50-364, Reactor Systems Branch Question 210.3, September 22, 1980
Johnston Pump Company Performance Test Curve, Rev. 1
NMP-ES-027, Maintenance Rule Program, Ver. 4
NMP-ES-027-001, Maintenance Rule Implementation, Ver. 6
NUREG-75/034, SER, Supplement No. 1, Joseph M. Farley Nuclear Plant Units 1 and 2, October 1975
NUREG-75/034, SER, Supplement No. 2, Joseph M. Farley Nuclear Plant Units 1 and 2, October 1975
SNC-1, Quality Assurance Topical Report, Ver. 14
Sulzer Pumps (US) Inc. Performance Test Curve, Rev. 0
10CFR21-0082 10CFR21 Reporting of Defects and Non-Compliance, Rev. 2
Certificate of Conformance, Speed Switch Assembly (SST2400A-8), Wyle Job No.: T71150, Dated: September 6, 2013
C050889101E015, Farley Nuclear Plant – Unit 1 and 2, Diesel Engine Generators 1C and 2C Operation and Maintenance Manual Volumes 1 and 2, Ver. 4
C050889101E017, Farley Nuclear Plant – Unit 1 and 2, Wyle Report No. 43321R00 – Mild Environment Aging Analysis of Digital Reference Unit Woodward P/N 9903-439, 2301A Speed Control Woodward P/N 9903-337 and EGB-13P Governor/Actuator Woodward P/N 9903-561 for Coltec Industries, Ver. 1
C050889101E019, Farley Nuclear Plant – Unit 1 and 2, Wyle Report No. 45184R01 – Mild Environment Aging Analysis of Two Magnetic Pickups (Fairbanks Morse P/N T12618138 and T11908130) for Fairbanks Morse, Ver. 1
DOEJ-FDC050889101-E003 Document of Engineering Judgement, Evaluation of the Emergency Diesel Generator 2C 2301A Analog Governor Control System's Electromagnetic Compatibility, Ver. 1
DOEJ-FDSNC86713-J001 Document of Engineering Judgement, EMC Evaluation for the TDAFWP UPS and Rectifier, Ver. 1
PER-1110513201 RCP Feeder Breaker Control Fuse Evaluation, Seq. No: 02
TE-776441 Evaluate/Create a PM Strategy for the New EDG Dynalco Speed switch, Dated 2/20/2014
TR-112175 Capacitor Application and Maintenance Guide, Final Report, August 1999
U-735582 Farley Nuclear Plant – Unit No. 1 and 2, Seismic Test Report for a Struthers Dunn Relay with Socket, Ver. 1

Work Orders
2072562301
SNC 259612
SNC389937
SNC406258
SNC406258
SNC431372
SNC495995
SNC495996
SNC496141
SNC496189
SNC594281
SNC622619
SNC64147
SNC64148
SNC66734
SNC83597
SNC654157
SNC 390318
SNC 389639

Corrective Action Program Documents generated as a result of the inspection

10123751, Revise STP-45.15
10167824, Steam Leak 1A SG MSIV
10167988, Gauge Glass Found Broken
10168014, Flex Conduit 1A MDAFWP Rm
10169070, DCP was Not Closed in Accordance with Procedure
10170872, Insulation on Floor
10175336, FSAR Chapter 15 Clarification Request for 15.2.8.2.1.(H)
10175353, Maximo Safety Class Field for Emergency Air Compressors Needs to be re-Evaluated
10178034, Consider adding Caution Statement for Critical Speeds of EDGs
10191115, Dose Calculation for ARV Hand Wheel
10191231, Revise TS Bases 3.7.4
10178081, 50.59 Screening of DCP 459692
10178098, Licensing Basis for Steam Generator Tube Rupture Event
10191115, Calculate Mission Dose for Manual Operation of the ARV
10191541, Evaluate Scaffold or Platform in MSVR
10193323, NRC Information Request - SGTR Operator Response Time
10177393, Re-scoping of Maintenance Rule P18-F01
TE 952125, Add SGTR with LOSP to TCOA Program