

Charles R. Pierce
Regulatory Affairs Director

Southern Nuclear
Operating Company, Inc.
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, AL 35242

Tel 205.992.7872
Fax 205.992.7601



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Docket No.: 50-364

NL-16-0250

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

Joseph M. Farley Nuclear Plant – Unit 2
Completion of Required Action for NRC Order EA-12-049
Mitigation Strategies for Beyond-Design-Basis External Events

Ladies and Gentlemen:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order EA-12-049, *Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events*, to Southern Nuclear Operating Company (SNC). This Order was immediately effective and directs the Joseph M. Farley Nuclear Plant (FNP) - Units 1 and 2 to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. This letter, along with the Enclosure, provides the notification required by Item IV.C.3 of Order EA-12-049 that full compliance with the requirements described in Attachment 2 of the Order has been achieved for FNP Unit 2.

This letter contains no new NRC commitments. If you have any questions, please contact John Giddens at 205.992.7924.

Mr. C. R. Pierce states he is the Regulatory Affairs Director for 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.

Respectfully submitted,

C. R. Pierce

C. R. Pierce
Regulatory Affairs Director

CRP/JMG/MRE

Sworn to and subscribed before me this 22 day of June, 2016.

Laura L. Crisp
Notary Public

My commission expires: 10-8-2017

Enclosure: Compliance with Order EA-12-049

cc: Southern Nuclear Operating Company
Mr. S. E. Kuczynski, Chairman, President & CEO
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer
Ms. C. A. Gayheart, Vice President – Farley
Mr. M. D. Meier, Vice President – Regulatory Affairs
Mr. B. J. Adams, Vice President – Engineering
Mr. D. R. Madison, Vice President – Fleet Operations
Ms. B.L. Taylor, Regulatory Affairs Manager – Farley
RType: CFA04.054

U. S. Nuclear Regulatory Commission
Mr. W. M. Dean, Director of the Office of Nuclear Reactor Regulations
Ms. C. Haney, Regional Administrator
Mr. S. A. Williams, NRR Senior Project Manager – Farley
Mr. P. K. Niebaum, Senior Resident Inspector – Farley

Alabama Department of Public Health
Dr. T. M. Miller, MD, State Health Officer

Joseph M. Farley Nuclear Plant – Unit 2
Completion of Required Action for NRC Order EA-12-049
Mitigation Strategies for Beyond-Design-Basis External Event

Enclosure

Compliance with Order EA-12-049

BACKGROUND

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Reference 1), to Southern Nuclear Operating Company (SNC). This Order was effective immediately and directed the Joseph M. Farley Nuclear Plant (FNP) - Units 1 and 2 to provide diverse and flexible strategies (FLEX) in response to Order EA-12-049. SNC developed an Overall Integrated Plan (OIP) (Reference 6) to provide FLEX. The information provided herein, as well as the implementation of the OIP (Reference 6 and revised in Reference 13), documents full compliance for FNP Unit 2 in response to the Order (Reference 1).

OPEN ITEM RESOLUTION

Following issuance of the NRC Audit Report (Reference 19), there were no open items from either it or the NRC Interim Staff Evaluation (ISE) (Reference 8). All identified items in the audit have been addressed and documented in the site CAP program.

- ISE Open Item (ISE OI) – FNP Unit 2 has no open items
- Licensee Identified Open Items - FNP Unit 2 has no open or pending licensee identified open items
- FLEX Audit Questions/Audit Report Open Items – FNP Unit 2 has no open items.

MILESTONE SCHEDULE - ITEMS COMPLETE

FNP Unit 2 Milestone	Completion Date
Submit 20 Day Letter Acknowledging Receipt of Order	March 2012
Submit Overall Integrated Plan	February 2013
Unit 2 - 1st Refueling Outage	May 2013
1 st 6 Month Update	August 2013
2 nd 6 Month Update	February 2014
3 rd 6 Month Update	August 2014
4 th 6 Month Update	February 2015
Develop Modifications	December 2015
5 th 6 Month Update	August 2015
Develop Training Material	December 2015
Develop Strategies (Farley Response Plan) with National SAFER Response Center	December 2015
Develop Operational Procedure Changes	December 2015
Develop FSGs	December 2015
6 th 6 Month Update	February 2016
Phase 2 Equipment Procurement Complete	March 2016
Implement Training	March 2016

FNP Unit 2 Milestone	Completion Date
Unit 2 Walk-throughs or Demonstrations	March 2016
Issue FSGs	May 2016
Unit 2 - 2nd Refueling Outage / Implementation Complete	May 11, 2016

ORDER EA-12-049 COMPLIANCE ELEMENTS SUMMARY

The elements identified below for FNP Unit 2 as well as the FLEX OIP (Reference 6), the 6-Month Status Reports (References 7, 9, 13, 15, 16, and 20) and additional docketed correspondence, demonstrate compliance with Order EA-12-049.

STRATEGIES - COMPLETE

FNP Unit 2 strategies are in compliance with Order EA-12-049. There are no strategy related Open Items, Confirmatory Items, or Audit Questions/Audit Report Open Items.

MODIFICATIONS - COMPLETE

The modifications required to support the FLEX strategies for FNP Unit 2 have been fully implemented in accordance with the station processes.

EQUIPMENT - PROCURED AND MAINTENANCE & TESTING - COMPLETE

The equipment required to implement the FLEX strategies for FNP Unit 2 has been procured, initially tested, received at FNP, site acceptance tested and performance verified as recommended in accordance with NEI 12-06, *Diverse and Flexible Coping Strategies (FLEX) Implementation Guide*, and is available for use.

Maintenance and testing requirements are included in the FNP Unit 2 Preventative Maintenance Program such that equipment reliability is monitored and maintained. All maintenance and testing activities have been identified. All six month or less PM's have been developed and performed. Greater than 6 month PMs have been developed and will be performed on their scheduled performance due date.

PROTECTED STORAGE - COMPLETE

The storage facility required to implement the FLEX strategies for FNP Unit 2 has been constructed and provides adequate protection from the applicable site hazards. The equipment required to implement the FLEX strategies for FNP Unit 2 is stored in its protected configuration.

PROCEDURES - COMPLETE

FLEX Support Guidelines (FSGs) for FNP Unit 2 have been developed and integrated with existing procedures. The FSGs and applicable procedures have been verified and are available for use in accordance with the site procedure control program.

TRAINING - COMPLETE

Training for FNP Unit 2 has been completed in accordance with an accepted training process, as recommended in NEI12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide.

STAFFING - COMPLETE

The Phase 2 staffing study for FNP (Reference 12) has been completed in accordance with 10 CFR 50.54(f) letter (Reference 2). The NRC has reviewed the Phase 2 staffing study and concluded that it adequately addresses the response strategies needed to respond to a beyond design basis external event using FNP procedures and guidelines. This is documented in NRC letter dated September 29, 2014 (Reference 14).

COMMUNICATIONS - COMPLETE

FNP committed to compliance with the communications capabilities in accordance with the 10 CFR 50.54(f) letter (Reference 21). Implementation of the backup satellite service ultimately did not include shared cellular or data capability as originally planned; however, those capabilities were not relied on for compliance. The Rapidcom system has the capability to provide data communications should the TSC deem it is needed.

NATIONAL SAFER RESPONSE CENTERS - COMPLETE

SNC has established a contract with Pooled Equipment Inventory Company (PEICo) and has joined the Strategic Alliance for FLEX Emergency Response (SAFER) Team (Equipment Committees) for off-site facility coordination. It has been confirmed that PEICo is ready to support FNP Units 1 and 2 with Phase 3 FLEX equipment stored in the National SAFER Response Centers in accordance with the site specific SAFER Response Plan.

VALIDATION - COMPLETE

SNC has completed validation in accordance with industry developed guidance to assure required tasks, manual actions and decisions for FLEX strategies are feasible and may be executed within the constraints identified in the FLEX OIP for Order EA-12-049 (References 1, 6, and 13).

FLEX PROGRAM DOCUMENT - ESTABLISHED

The SNC FNP FLEX Program Document has been developed in accordance with the requirements of NEI12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide.

REFERENCES:

The following references support the FNP Unit 2 compliance with the requirements of Order EA-12-049:

1. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012.
2. NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident, dated March 12, 2012.
3. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA 12 049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012.
4. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012.
5. Joseph M. Farley Nuclear Plant- Units 1 and 2 Initial Status Report in Response to Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049), dated October 23, 2012.
6. Joseph M. Farley Nuclear Plant- Units 1 and 2 Overall Integrated Plan in Response to Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049), dated February 27, 2013.
7. Joseph M. Farley Nuclear Plant- Units 1 and 2 First Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049), dated August 27, 2013.
8. NRC Letter, Joseph M. Farley Nuclear Plant, Units 1 and 2 - Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Order EA-12-049 (Mitigation Strategies) (TAC NOS. MF0716 and MFO717), dated January 17, 2014.
9. Joseph M. Farley Nuclear Plant - Units 1 and 2 Second Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049), dated February 26, 2014.
10. Joseph M. Farley Nuclear Plant – Units 1 and 2 Request for Relaxation of Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049) dated February 26, 2014.
11. NRC Letter, Relaxation of Certain Schedule Requirements for Order EA-12-049, dated April 14, 2014.
12. Joseph M. Farley Nuclear Plant– Units 1 and 2 Response to Request for Information Pursuant to Title 10 CFR 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the NTF Review of Insights from the Fukushima Daiichi Accident, dated March 12, 2012, dated June 6, 2014.

13. Joseph M. Farley Nuclear Plant- Units 1 and 2 Third Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049) dated August 26, 2014, including Enclosure 2 – Farley Units 1&2 Mitigation Strategies (FLEX) Overall Integrated Implementation Plan (OIP), Revision 4.
14. NRC Letter, Response Regarding Licensee Phase 2 Staffing Submittals Associated With Near-Term Task Force Recommendation 9.3 Related To The Fukushima Dai-Ichi Nuclear Power Plant Accident, dated September 29, 2014 (ML 14262A296).
15. Joseph M. Farley Nuclear Plant- Units 1 and 2 Fourth Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049), dated February 26, 2015.
16. Joseph M. Farley Nuclear Plant- Units 1 and 2 Fifth Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049), dated August 27, 2015.
17. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 2, dated December 2015.
18. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 1, dated January 22, 2016.
19. NRC letter, Joseph M. Farley Nuclear Plant, Units 1 and 2 - Report for the Audit Regarding Implementation of Mitigating Strategies and Reliable Spent Fuel Pool Instrumentation Related to Orders EA-12-049 and EA-12-051 (TAC NOS. MF0716 and MF0717), dated February 8, 2016.
20. Joseph M. Farley Nuclear Plant- Units 1 and 2 Sixth Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049), dated February 29, 2016.
21. Joseph M. Farley Nuclear Plant Notification of Commitment Completion - NTTF Recommendation 9.3, dated May 6, 2016.