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Farley Project

Southern Nuclear Operating Company
the southern electric system

November 24, 1993

10 CFR 50.90

Docket Nos. 50-348
50-364

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

Joseph M. Farley Nuclear Plant
Request to Revise Technical Specifications--
Relocation of Reactor Trip and Engineered Safety Feature
Actuation System Response Time Limits

Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) proposes to amend the Farley Unit 1 and Unit 2 Technical Specifications (TS) to relocate the response time limits for the Reactor Trip System (RTS) and the Engineered Safety Feature Actuation System (ESFAS) from the TS to the Final Safety Analysis Report (FSAR). The proposed change is administrative in nature and is consistent with the guidance provided in the draft generic communication issued by the Nuclear Regulatory Commission (NRC) and published in the Federal Register (58FR18118) April 7, 1993. Accordingly, the response time limits will be relocated to Chapter 7 of the FSAR and the surveillance requirement to periodically measure the RTS and ESFAS response times will remain in the TS. In addition, the proposed changes modify the TS Bases to include a reference to the appropriate tables in Chapter 7 of the FSAR that provide response time limits for the RTS and ESFAS.

The safety analysis for the proposed TS changes is provided in Enclosure 1. The supporting significant hazards evaluation pursuant to 10 CFR 50.92 is provided in Enclosure 2. Based upon the analysis provided, SNC has determined the proposed changes to the TS do not involve a significant hazards consideration as defined by 10 CFR 50.92. SNC has also determined that the proposed changes will not significantly affect the quality of the environment. The revised typed pages of the proposed TS, including page change instructions, are included in Enclosure 3. The hand-marked pages are provided in Enclosure 4. The associated FSAR changes are included in Enclosure 5.

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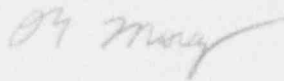
U. S. Nuclear Regulatory Commission
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A copy of these proposed changes has been sent to Dr. D. E. Williamson, the Alabama State Designee, in accordance with 10 CFR 50.91(b)(1).

If there are any questions, please advise.

Respectfully submitted,

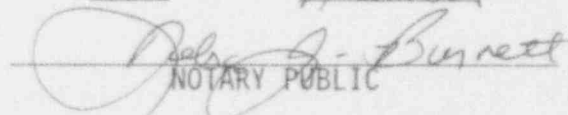
SOUTHERN NUCLEAR OPERATING COMPANY



Dave Morey

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 24th DAY OF November 1993


NOTARY PUBLIC

My Commission Expires: 9-14-94

DNM/MGE/TWS/sar TCHPEC4.MGE

Enclosures

1. Safety Analysis
2. 10 CFR 50.92 Evaluation
3. T.S. Page Change Instructions and Revised Pages
4. T.S. Hand-Marked Pages
5. FSAR Changes

cc: Mr. S. D. Ehnetter
Mr. T. A. Reed
Mr. G. F. Maxwell
Dr. D. E. Williamson

Enclosure 1

Safety Analysis

Technical Specification Changes Associated with
Relocation of Reactor Trip and Engineered Safety Feature
Actuation System Response Time Limits

Joseph M. Farley Nuclear Plant - Units 1 and 2
Technical Specification Changes Associated with
Relocation of Reactor Trip and Engineered Safety Feature
Actuation System Response Time Limits

Safety Analysis

Proposed Change 1

Revise Technical Specification (TS) 3.3.1 associated with Reactor Trip System (RTS) instrumentation to delete "with RESPONSE TIMES as shown in Table 3.3-2" and relocate Table 3.3-2 to the FSAR.

Basis for Proposed Change 1

The proposed change is administrative in nature and is consistent with the guidance provided by the Nuclear Regulatory Commission (NRC) draft communication, "The Relocation of the Technical Specification Tables on Instrument Response Time Limits," published in Federal Register (58FR18118) dated April 7, 1993. Surveillance Requirement 4.3.1.3 will continue to require that the RTS response time be demonstrated to be within its limit at least once per 18 months. However, the RTS response time limits will be specified in Chapter 7 of the FSAR as opposed to the current location in Table 3.3-2 of the TS. Relocating the table from the TS to the FSAR will not alter these surveillance requirements. Additionally, the exemption for response time testing of neutron detectors that currently appears as a footnote to TS Table 3.3-2 will be relocated as a footnote to Surveillance Requirement 4.3.1.3 in order to retain this exemption. The proposed change will allow Southern Nuclear Operating Company (SNC) to administratively control changes to the response time limits for the RTS instruments in accordance with the provisions of 10 CFR 50.59 without the need to process a license amendment request.

Proposed Change 2

Revise TS 3.3.2 associated with Engineered Safety Feature Actuation System (ESFAS) instrumentation to delete "and with RESPONSE TIMES as shown in Table 3.3-5" and relocate Table 3.3-5 to the FSAR.

Basis for Proposed Change 2

The proposed change is administrative in nature and is consistent with the guidance provided by the NRC draft communication, "The Relocation of the Technical Specification Tables on Instrument Response Time Limits," published in Federal Register (58FR18118) dated April 7, 1993. Surveillance Requirement 4.3.2.3 will continue to require that the ESFAS response time be demonstrated to be within its limit at least once per 18 months. However, the ESFAS response

Enclosure 1
Safety Analysis

time limits will be specified in Chapter 7 of the FSAR as opposed to the current location in Table 3.3-5 of the TS. Relocating the table from the TS will not alter these surveillance requirements. The proposed change will allow SNC to administratively control changes to the response time limits for the ESFAS instruments in accordance with the provisions of 10 CFR 50.59 without the need to process a license amendment request.

Proposed Change 3

Revise TS Bases 3/4.3.1 and 3/4.3.2 associated with both the RTS and the ESFAS to reference the response time limits in FSAR Tables 7.2-5 and 7.3-16, respectively.

Basis for Proposed Change 3

The proposed change modifies TS Bases Sections 3/4.3.1 and 3/4.3.2 to add a reference to the appropriate FSAR tables for the response time limits associated with the RTS and the ESFAS. This change is administrative in nature and will not adversely impact operation of the plant. Relocation of the tables for the RTS and ESFAS instrument response time limits from the TS to the FSAR will not alter these surveillance requirements. However, this change will allow SNC to administratively control changes to the response time limits for the RTS and the ESFAS instruments in accordance with the provisions of 10 CFR 50.59 without the need to process a license amendment request.

Enclosure 2

10 CFR 50.92 Evaluation

Technical Specification Changes Associated with
Relocation of Reactor Trip and Engineered Safety Feature
Actuation System Response Time Limits

Joseph M. Farley Nuclear Plant - Units 1 and 2
Technical Specifications Changes Associated with
Relocation of Reactor Trip and Engineered Safety Feature
Actuation System Response Time Limits

10 CFR 50.92 Evaluation

Proposed Changes

The proposed changes to the Farley Unit 1 and Unit 2 Technical Specifications (TS) relocate the Reactor Trip System (RTS) and Engineered Safety Feature Actuation System (ESFAS) response time limits from the TS to Chapter 7 of the Final Safety Analysis Report (FSAR).

Background

On April 7, 1993, the Nuclear Regulatory Commission (NRC) placed a notice in the Federal Register (58FR18118) regarding a proposed generic communication titled "The Relocation of Technical Specification Tables on Instrument Response Time Limits." The Federal Register notice provided guidance to licensees regarding the relocation of the response time limits for the RTS and the ESFAS from the TS to the FSAR.

Analysis

The proposed changes to the Farley Unit 1 and Unit 2 TS relocates the response time limits for the RTS and the ESFAS found in TS Tables 3.3-2 and 3.3-5, respectively, to Chapter 7 of the FSAR. This change is administrative in nature and is consistent with the guidance provided by the draft generic communication published in 58FR18118 April 7, 1993. The requirement to perform surveillance testing to demonstrate that the response time of each RTS function and each ESFAS function is within its limit will be retained in the TS. Relocating the tables for the RTS and ESFAS instrument response time limits from the TS to the FSAR will allow changes to the response time limits in accordance with the provisions of 10 CFR 50.59 without the need to process a license amendment request.

Southern Nuclear Operating Company (SNC) has reviewed the requirements of 10 CFR 50.92 as they relate to the proposed changes and has made the following determination:

1. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes are administrative in nature and do not involve any change to the configuration or method of operation of any plant equipment used to mitigate the consequences of an accident. Also, the proposed changes do not alter the conditions or assumptions in any of the FSAR accident analyses. Since the FSAR accident analyses remain bounding, the radiological consequences previously evaluated are not adversely affected by the proposed changes. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.
2. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes are administrative in nature and do not involve any change to the configuration or method of operation of any plant equipment used to mitigate the consequences of an accident. Accordingly, no new failure modes have been defined for any plant system or component important to safety nor has any new limiting failure been identified as a result of the proposed changes. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. The proposed changes do not involve a significant reduction in a margin of safety. The proposed changes are administrative in nature and will continue to ensure that the response times for the RTS and ESFAS instrumentation do not exceed the limits assumed in the accident analyses. As a result of the proposed changes, response time limits for the RTS and ESFAS will be administratively controlled in accordance with the provisions of 10 CFR 50.59, thus eliminating an unnecessary burden of governmental regulation without reducing protection for public health and safety. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Conclusion

Based on the preceding analysis, SNC has determined the proposed changes to the US will not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. Therefore, SNC has determined the proposed changes meet the requirements of 10 CFR 50.92(c) and do not involve a significant hazards consideration.

Enclosure 3

Page Change Instructions and Revised Pages

Technical Specification Changes Associated with
Relocation of Reactor Trip and Engineered Safety Feature
Actuation System Response Time Limits