



Southern Nuclear Operating Company

August 17, 1994

*the southern electric system*

Dave Morey  
Vice President  
Farley Project

Docket Nos. 50-348  
50-364

10 CFR 50.90

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

Joseph M. Farley Nuclear Plant  
Technical Specifications Change Request  
Elimination of Periodic Pressure Sensor Response Time Testing Requirements

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 to eliminate periodic pressure sensor response time testing requirements. The proposed amendment modifies the Reactor Trip System (RTS) and Engineered Safety Feature Actuation System (ESFAS) Instrumentation Surveillance Requirements 4.3.1.3 and 4.3.2.3 to indicate that the total channel response time will be periodically "verified" versus "tested" to demonstrate acceptable protection system response time. The associated Bases revision clarifies that allocations for sensor response times may be obtained from: 1) historical records based on acceptable response time tests; 2) in-place, onsite, or offsite (e.g., vendor) test measurements; or 3) utilizing vendor engineering specifications. WCAP-13632, Revision 1, "Elimination of Pressure Sensor Response Time Testing Requirements," provides both the technical basis for deleting periodic pressure sensor response time testing and the methodology for verifying the total channel response time using an allocated sensor response time.

The proposed Technical Specifications changes are provided in Attachment I. WCAP-13632, Revision 1 (Westinghouse proprietary class 2) and WCAP-13787, Revision 1 (Westinghouse proprietary class 3) are included in Attachment II, along with Westinghouse authorization letter CAW-94-565 and accompanying affidavit, proprietary information notice, and copyright notice. As WCAP-13632, Revision 1 contains information proprietary to Westinghouse Electric Corporation, it is supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.790 of the Commission's regulations. Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse affidavit should reference CAW-94-565 and should be addressed to Nicholas J. Liparulo, Manager of Nuclear Safety and Regulatory Activities, Westinghouse Electric Corporation, P. O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

With regard to the current industry effort to minimize the Technical Specifications response time testing requirements, the Westinghouse Owners Group (WOG) has participated in

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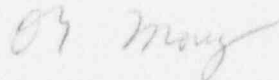
meetings with the BWR Owners Group (BWROG) and the NRC Staff to ensure that the WOG understood the Staff's concerns outlined in the NRC Safety Evaluation Report for the BWROG Licensing Topical Report, "System Analyses for Elimination of Selected Response Time Testing Requirements." WCAP-13632, Revision 1 addresses the Staff concerns and includes a cost benefit evaluation and a safety assessment for increased response times beyond the current limits. In addition, Attachment III of this letter provides a specific response for each question listed in Section 4 of the subject NRC SER.

The significant hazards evaluation is provided in Attachment IV. SNC has determined the proposed changes to the Technical Specifications do not involve a significant hazards consideration as defined by 10 CFR 50.92. SNC has also determined the proposed changes will not significantly affect the quality of the environment. A copy of the proposed changes has been sent to Dr. D. E. Williamson, the Alabama State Designee, in accordance with 10 CFR 50.91(b)(1).

In that Farley is a lead plant for the Westinghouse Owners Group (WOG), your prompt response to this proposed Technical Specifications change is respectfully requested. The elimination of periodic sensor response time testing will result in reduced radiation exposure and maintenance testing manhours. For Farley, the expected savings will be greater than \$100,000 over the life of the plant; as such, this submittal should be considered as a Cost Beneficial Licensing Action (CBLA). Should there be any questions, please advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Dave Morey

SWORN TO AND SUBSCRIBED BEFORE ME

This 17<sup>th</sup> day of August, 1994

Martha Gayle Dow  
Notary Public

My Commission Expires: 11/01/97

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Attachments

cc: Mr. B. L. Siegel  
Mr. S. D. Ebnetter  
Mr. T. M. Ross  
Dr. D. E. Williamson

## **ATTACHMENT I**

FNP Unit 1 Technical Specifications Proposed Changed Pages List

FNP Unit 1 Technical Specifications Marked-up Pages

FNP Unit 1 Technical Specifications Typed Pages

FNP Unit 2 Technical Specifications Proposed Changed Pages List

FNP Unit 2 Technical Specifications Marked-up Pages

FNP Unit 2 Technical Specifications Typed Pages