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Southern Nuclear Operating Company
the southern electric system

March 6, 1995

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 Relocate Seismic and Meteorological
Monitoring Instrumentation Technical Specifications to FSAR

Ladies and 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 Seismic and Meteorological Monitoring Instrumentation from the TS to the Final Safety Analysis Report (FSAR). The proposed changes are consistent with the NRC "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" dated July 22, 1993. Accordingly, the seismic and meteorological monitoring instrumentation will be relocated to the FSAR. Compliance with 10 CFR 50.59 and applicable regulatory guidance will ensure acceptable seismic and meteorological monitoring instrumentation performance is maintained.

This change will facilitate more efficient use of NRC and SNC resources by allowing future installation of replacement instrumentation without the need for a License Amendment. For example, the presently installed seismic recording instrumentation is scheduled for replacement. Available replacements offer superior performance, including accuracy. However, the performance parameters for the proposed replacement equipment vary from those detailed in the existing TS. Relocation of the instruments to the FSAR will allow evaluation of such changes via 10 CFR 50.59. In order to facilitate the presently planned seismic instrumentation replacements, NRC approval is requested by May 15, 1995.

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Note that SNC is transferring all of the TS requirements for the seismic and meteorological instrumentation to the FSAR for future control per 10 CFR 50.59 with the following exception. The Special Reports regarding inoperable instrumentation in TS 3.3.3.3(a) and 3.3.3.4(a) will no longer be required. This instrumentation will be treated consistent with other important but non-TS instrumentation inservice at FNP.

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. Enclosure 3 provides the proposed Technical Specification changed pages. The hand-marked pages are provided in Enclosure 4.

The Plant Operation Review Committee has reviewed and recommended approval of these proposed changes. A copy of these proposed changes is being 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

DM
Dave Morey

DPH:maf SEISMIC1.DOC

Enclosures:

1. Safety Analysis
2. 10 CFR 50.92
3. TS Changed Pages
4. TS Hand-Marked Pages

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 6th DAY OF March 1995

Martha Gayle Dow
Notary Public

MY COMMISSION EXPIRES November 1, 1997

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

ENCLOSURE 1

Joseph M. Farley Nuclear Plant Request to Relocate Seismic and Meteorological Instrumentation Technical Specifications to FSAR

Safety Analysis

Proposed Change

Remove Technical Specification (TS) requirements and associated Bases for the Seismic and Meteorological Monitoring Instrumentation and relocate the information to the FSAR.

Basis for Proposed Change

The proposed changes are administrative in nature since the changes are consistent with approved NRC guidance for TS as discussed in detail below. Relocation of the Seismic and Meteorological Monitoring Instrumentation TS will not decrease the effectiveness of the instrumentation. However, this change will allow SNC to administratively control changes to the seismic and meteorological monitoring instrumentation in accordance with the provisions of 10 CFR 50.59.

On July 22, 1993, the Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors became effective. According to the Policy Statement, the purpose of the TS is to impose those conditions or limitations upon reactor operation necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety by identifying those features that are of controlling importance to safety and establishing on them certain conditions of operation which cannot be changed without prior Commission approval. The Policy Statement establishes an objective set of criteria which delineate the constraints on operation of nuclear power plants that belong in the TS, in accordance with 10 CFR 50.36 and the purpose of the TS. Specifically, these criteria are as follows:

Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents challenge to the integrity of a fission product barrier.

A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

In accordance with this Policy Statement, improved Standard Technical Specification (STS) have been developed for each Nuclear Steam Supply System (NSSS) owners group. The Westinghouse NSSS STS is embodied in NUREG-1431 "Standard Technical Specifications, Westinghouse Plants." Seismic and Meteorological Instrumentation requirements have been determined to be outside the NRC criteria for inclusion in STS as evidenced by their omission from NUREG-1431. On this basis, relocation of TS requirements for Seismic and Meteorological Instrumentation to the FSAR is consistent with the NRC Final Policy Statement for Technical Specification Improvements. Continued compliance with 10 CFR 50.59 and applicable regulatory guidance will ensure that the Seismic and Meteorological Instrumentation remain viable.

ENCLOSURE 2

Joseph M. Farley Nuclear Plant Request to Relocate Seismic and Meteorological Instrumentation Technical Specifications to FSAR

10 CFR 50.92 Evaluation

Background

Presently the FNP Unit 1 and Unit 2 Technical Specifications (TS) contain detailed requirements regarding surveillance and performance characteristics of seismic and meteorological monitoring instrumentation. These requirements are presently located in TS 3/4.3.3.3 and 3/4.3.3.4. SNC proposes to remove the TS requirements and associated Bases for the Seismic and Meteorological Monitoring Instrumentation and relocate the information to the FSAR. This TS change will facilitate future changes to the seismic and meteorological instrumentation under the control of 10 CFR 50.59. For example, SNC presently plans to replace seismic accelerographs in 1995. The new instruments offer superior performance to the presently installed accelerographs and meet all regulatory requirements; however, the range of the accelerographs is outside the range allowed in Table 3.3-7. Rather than revise the existing table, SNC chooses to relocate this information consistent with recent industry and NRC guidance as described below.

Analysis

The proposed changes are administrative in nature since the changes are consistent with approved NRC guidance for TS as discussed in detail below. Relocation of the Seismic and Meteorological Monitoring Instrumentation TS will not decrease the effectiveness of the instrumentation. However, this change will allow SNC to administratively control changes to the seismic and meteorological monitoring instrumentation in accordance with the provisions of 10 CFR 50.59.

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A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

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Results

Southern Nuclear 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

No. The proposed change relocates information from the TS to the FSAR and has no impact on physical plant operation or configuration. The continued capability of the seismic and meteorological instrumentation to perform its intended function will be ensured through controlled change processes governed by 10 CFR 50.59.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any previously evaluated?

No. The sole function of the seismic and meteorological monitoring instrumentation is to record data. The proposed change will not involve any design change or modification to the plant. The proposed change will not alter the operation of the plant or the manner in which it is operated. Any subsequent change to the Seismic and Meteorological Monitoring Instrumentation requirements will undergo a review in accordance with the criteria of 10 CFR 50.59 to ensure that the change does not involve an unreviewed safety question.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

No. The proposed change will relocate Seismic and Meteorological Monitoring Instrumentation requirements from the TS to licensee controlled documents subject to the criteria of 10 CFR 50.59. The proposed change will have no adverse impact on any protective boundary or safety limit.

Therefore, the proposed change will not involve a significant reduction in a margin of safety.

Conclusion

Therefore, SNC has determined the proposed changes meet the requirements of 10 CFR 50.92(c) and do not involve a significant hazards consideration.