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Southern Nuclear Operating Company
the southern electric system

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50-364

10 CFR 50.54

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

Joseph M. Farley Nuclear Plant
Response to Generic Letter 92-01, Revision 1, Supplement 1
Reactor Vessel Structural Integrity

Ladies and Gentlemen:

The NRC issued Generic Letter 92-01, Revision 1, Supplement 1 (GL92-01, R1, S1), Reactor Vessel Structural Integrity, on May 19, 1995. In the generic letter supplement, the NRC identified a concern that licensees may not have all of the relevant data pertinent to the evaluation of the structural integrity of their reactor pressure vessels. The generic letter supplement requested licensees to respond within 90 days describing those actions taken or planned to locate all data relevant to the determination of reactor vessel integrity, or an explanation of why the existing data is considered complete as previously submitted. Additionally, GL92-01, R1, S1 requested licensees to provide the following information within 6 months of the date of the generic letter supplement:

- an assessment of any change in best-estimate chemistry based on consideration of all relevant data;
- a determination regarding the need to use the ratio procedure described in Position 2.1 of Regulatory Guide 1.99, Revision 2; and
- a written report providing any newly acquired data and; (a) the results of any necessary revisions to the evaluation of RPV integrity in accordance with the requirements of 10 CFR 50.60, 10 CFR 50.61, Appendices G and H to 10 CFR 50, and any potential impact on the LTOP or P-T limits or (b) a certification that all information previously submitted remains valid.

This letter provides the Southern Nuclear Operating Company (SNC) 90-day response to GL92-01, R1, S1 for Farley 1 and 2.

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SNC was a charter member of the Combustion Engineering Reactor Vessel Group (CE-RVG) which was formed in 1991 for the purpose of collecting and organizing the original fabrication records for CE-fabricated reactor vessels. SNC has received the draft CE-RVG report and copies of the fabrication records for Farley 1 and 2. In addition, SNC will consider the following information to determine the impact on the Farley 1 and 2 reactor vessel integrity analyses:

- NRC Reactor Vessel Integrity Database (RVID)
- CE-RVG Phase II Database
- ATI/WOG Database (including ORNL PR-EDB)
- EPRI - RMATCH Database
- EPRI - PREP3 Database

Based on the information from the above sources, SNC will identify utilities that share a common material heat with the Farley reactor vessels and work closely with these utilities to resolve any discrepancies that may be identified in the material properties for the shared material heats. Due to the volume of information that must be reviewed in order to ensure consideration of all relevant information pertinent to reactor vessel integrity, SNC does not expect to provide a complete response to GL92-01, R1, S1 within the 6-months requested. However, SNC will provide all newly acquired data to the NRC and will provide a schedule for evaluating the impact of the newly acquired information on the reactor vessel integrity analyses for Farley 1 and 2 prior to the 6-month requested response date.

As part of a long-term resolution of this issue, SNC is currently participating in the recently approved Combustion Engineering Owners Group - Reactor Vessel Working Group (CEOG-RVWG) weld chemistry variability task. The objective of this task is to determine best-estimate copper and nickel values for each weld material heat used in the beltline region of CE-fabricated reactor vessels. Completion of this task is currently projected to require a minimum of 18 months. Upon completion, the results of this task will be evaluated to determine the affect of any new information on the reactor vessel integrity analyses for Farley 1 and 2.

Should you have any questions, please advise.

SOUTHERN NUCLEAR OPERATING COMPANY

Dave Morey

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DNM/TWS

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 9th DAY OF August, 1995

Carol Louise Taylor
Notary Public

My Commission Expires: June 24, 1997

cc: Southern Nuclear Operating Company
R. D. Hill, Plant Manager

U. S. Nuclear Regulatory Commission, Washington, DC
B. L. Siegel, Licensing Project Manager, NRR

U. S. Nuclear Regulatory Commission, Region II
S. D. Ebnetter, Regional Administrator
T. M. Ross, Senior Resident Inspector