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Southern Nuclear Operating Company

the southern electric system

Dave Morey
Vice President
Farley Project

August 7, 1996

Docket Nos.: 50-364

10 CFR 50.4

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

Joseph M. Farley Nuclear Plant - Unit 2
Steam Generator F* Technical Specification Amendment

Ladies and Gentlemen:

By letter dated July 15, 1996, Southern Nuclear forwarded a proposed methodology for the determination of NDE measurement uncertainties to be used with the proposed F* technical specification amendment. In subsequent discussions with the NRC Staff, a concern has been expressed that only five essential variables were addressed in the methodology. Appendix H of the EPRI PWR Steam Generator Tube Examination Guidelines provides a list of a number of essential variables that were not included in the proposed methodology.

The essential variables cited in the methodology for the determination of the NDE uncertainty for the measurement of the position, length and inclination of the indication (July 15, 1996 Southern Nuclear to NRC letter) assume that the coil to be used is qualified for the detection of degraded regions of the tube. The specific measurement uncertainties addressed by this test program are affected by the five major groupings of variables listed. For this reason, some of the typical essential variables were omitted in this description. All qualification testing performed to validate the use of any specific technique is documented via a technique sheet. This includes, for example, frequencies, sampling rate, and other essential variables.

The techniques and coils used will have been qualified for the detection of degradation. The technique documentation will include information beyond what is typically included in the Appendix H documentation because the uncertainties to be measured are largely due to the control of the motion of the probe (rotation and axial translation). Thus, the delivery system, direction of the test and the probe speed are the primary contributors to this type of uncertainty. The coil type has some effect in terms of field spread. The various measurements and their uncertainties will be fully documented with respect to all essential variables of the test.

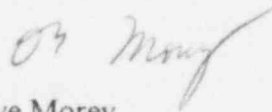
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If there are any questions, please advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Dave Morey

Sworn to and subscribed before me this 7th day of August, 1996

Martha Gayle Dow
Notary Public

My Commission Expires: November 1, 1997

REM/clt:F_NDE1.doc

cc: Mr. S. D. Ebnetter, Region II Administrator
Mr. B. L. Siegel, NRR Senior Project Manager
Mr. T. M. Ross, Plant Sr. Resident Inspector
Mr. T. A. Reed, NRR - Materials and Chemical Engineering Branch
Dr. D. E. Williamson, State Department of Public Health