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

Joseph M. Farley Nuclear Plant  
Technical Specification 3/4.9.13  
Storage Pool Ventilation (Fuel Movement)

Ladies and Gentlemen:

Recent differing opinions have arisen concerning application of Technical Specification 3/4.9.13 Storage Pool Ventilation (Fuel Movement) at Farley Nuclear Plant during modes 5, 6, or when defueled. The purpose of this letter is to request NRC review and concurrence of the FNP interpretation and basis for this technical specification. FNP is presently preparing a Technical Specification amendment to implement NUREG 1431, Rev. 1 and has committed to the NRC to do so in previous correspondence. Attachment 1 provides our position.

Respectfully submitted,

*by Dave Morey*  
Dave Morey

MJA:maf fuelv2.doc

Attachment

cc: Mr. S. D. Ebnetter  
Mr. J. I. Zimmerman  
Mr. T. M. Ross

*ADD 1*

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**FNPP Technical Specification 3/4.9.13**  
**Storage Pool Ventilation (Fuel Movement) Interpretation**

Technical Specification (TS) Limiting Condition For Operation

3.9.13 Two independent penetration room filtration systems (Specification 3.7.8) shall be OPERABLE and aligned to the spent fuel pool room:

**APPLICABILITY:** During crane operation with loads, over the fuel in the spent fuel pit and during fuel movement within the spent fuel pit.

**Position:**

A question has arisen as to whether the electrical system requirements for penetration room filtration system (PRF) in modes 5 or 6 are the same as required by TS 3.8.1.2.

In modes 5 or 6, TS 3.8.1.2 "Electrical Power" requires one circuit from the offsite transmission network to the switchyard and from the switchyard to the onsite Class 1E distribution system, and one diesel generator. This is consistent with the FNP licensing basis described in the FSAR. Therefore, when the plant is in modes 5 or 6 and normal power is available to both PRF systems through a single offsite power source (i.e. the normal in-plant 1E distribution is cross connected) and a single diesel generator is available, then both penetration filtration systems can be considered OPERABLE. When the plant is defueled, modes 5 and 6 requirements can be applied.

**Basis:**

Independence as used in 3.9.13 implies mechanical and electrical independence consistent with the licensing basis for FNP. The FNP licensing basis only requires consideration of single failure coincidence with loss of offsite power in modes 1, 2, 3, or 4. In modes 5 and 6, the electrical power TS requirements do not consider a single failure coincident with a loss of offsite power. The applicability of this TS is not mode dependent; however, no limiting condition of operation or surveillance requirement statement explicitly states that additional electrical power sources are required in modes 5 and 6. Therefore, reliance on TS 3.8.1.2 for the electrical power sources required in modes 5 and 6 must be assumed. Review of the applicable accident analyses show that a single PRF system is capable of ensuring that 10 CFR 100 limits of offsite dose are not reached in the event the worst case assumed dropped fuel assembly event occurs.

TS 3.9.13 LCO also makes reference to TS 3.7.8. This reference is required to clearly designate which PRF systems are required to support and meet fuel storage pool ventilation requirements. Without this reference the licensee could conceivably meet this requirement with other than intended filtration systems. It is not intended to imply that modes 1, 2, 3, or 4 requirements are required for the PRF system anytime TS 3.9.13 applies.

Improved Technical Specifications (ITS) (NUREG 1431) clarifies this condition. In the new LCO for the PRF system the term independent is eliminated. The PRF LCO requires that two PRF trains shall be OPERABLE. The ITS definition of OPERABLE is designed to ensure that the specified safety function is met. It states that normal or emergency electrical power be available. The ITS AC sources requirements in modes 5 or 6 are consistent with the existing FNP requirements. The ITS "AC Sources - Shutdown" bases (3B.3.8.2) state that for modes 5, 6, and during movement of irradiated fuel assemblies, adequate AC electrical power is provided to mitigate events postulated during shutdown, such as a fuel handling accident. It states the following:

"In general, when the unit is shutdown, the Technical Specifications requirements ensure that the unit has the capability to mitigate the consequences of postulated accidents. However, assuming a single failure and concurrent loss of all offsite or all onsite power is not required."

Furthermore the ITS bases state:

"In the event of an accident during shutdown, this LCO ensures the capability to support systems necessary to avoid immediate difficulty, assuming either a loss of all offsite power or a loss of all onsite diesel generator (DG) power."

The applicable accident analyses as described in the FNP FSAR are consistent with this basis and show that the intent of PRF operability during movement of fuel or loads over fuel in the fuel storage area is met considering only modes 5 or 6 electrical distribution requirements.