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10 CFR 50.90

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

Joseph M. Farley Nuclear Plant
Request to Revise Technical Specifications and Associated Bases
Storage Pool Ventilation (Fuel Movement)

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Southern Nuclear Operating Company (Southern Nuclear) proposes to amend the Joseph M. Farley Nuclear Plant Units 1 and 2 Technical Specifications (TSs). The proposed changes are found in TS 3/4.9.13, Storage Pool Ventilation (Fuel Movement), of the Unit 1 and Unit 2 TSs and the associated Bases. The first of these proposed changes will add a note in the TSs to specifically indicate that the normal or emergency power source may be inoperable in MODE 5 or 6 provided that the requirements of TS 3.8.1.2 are satisfied. The second of these proposed changes will extend the TS 3.9.13 completion time allowed for returning one out-of-service penetration room filtration system from 48 hours to 7 days. The Bases will also be modified to provide additional detail concerning these changes. These TS changes are technically consistent with the requirements of NUREG-1431, Revision 1, "Westinghouse Standard Technical Specifications," issued on April 7, 1995.

The basis for the proposed TS changes is provided in Enclosure 1. The supporting significant hazards evaluation pursuant to 10 CFR 50.91 is provided in Enclosure 2. Based upon the analysis provided, Southern Nuclear has determined that the proposed changes to the TS do not involve a significant hazards consideration as defined by 10 CFR 50.92. Southern Nuclear has determined that the proposed license amendment will not significantly affect the quality of the human environment.

The revised typed pages of the proposed TSs, including page change instructions, are included in Enclosure 3. The marked pages are provided in Enclosure 4.

The Plant Operations Review Committee has reviewed and recommended approval of these proposed changes. A copy of these proposed changes is being sent to Dr. Donald E. Williamson, the Alabama State Designee, in accordance with 10 CFR 50.91(b)(1).



Approval status of this amendment request will affect the upcoming outage duration. Therefore, NRC review and approval of these proposed changes is requested by October 1997, to support planning efforts for the Spring 1998 outage.

If there are any questions, please advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

Dave Morey
Dave Morey

Sworn to and subscribed before me this 13th day of June 1997

Martha Gayle Dow
Notary Public

My Commission Expires: November 1, 1997

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Enclosures:

1. Basis for Change Request
2. 10 CFR 50.92 Evaluation
3. Page Change Instructions and Revised Pages
4. Hand-Marked Pages

cc: Mr. L. A. Reyes, Region II Administrator
Mr. J. I. Zimmerman, NRR Project Manager
Mr. T. M. Ross, Plant Sr. Resident Inspector
Dr. D. E. Williamson, State Department of Public Health

ENCLOSURE 1

Joseph M. Farley Nuclear Plant Request to Revise Technical Specifications and Associated Bases Storage Pool Ventilation (Fuel Movement)

Basis for Change Request

The first of the proposed changes will add a note in technical specification (TS) 3/4.9.13 to specifically indicate that the normal or emergency power source may be inoperable in MODE 5 or 6 provided that the requirements of TS 3.8.1.2 are satisfied. Currently, the TSs do not specifically note that either the normal or emergency power sources may be inoperable during MODE 5 or 6. The Farley Nuclear Plant (FNP) design basis for electrical sources during refueling (TS 3.8.1.2) requires at least one offsite circuit through the 1E distribution system be operable and at least one of the emergency diesels be operable. If the present TS 3/4.9.13 was read to require that both independent penetration room filtration systems be operable when it is aligned to the spent fuel room during refueling operations - using the definition of OPERABLE in the TSs - each system would have to have at least one offsite circuit through the 1E distribution system and at least one of the emergency diesels to be operable. This interpretation would require that, for the Penetration Room Filtration system to be in an operable status when it is aligned to the spent fuel room during refueling operations, at least two offsite circuits through separate 1E distribution systems and at least two emergency diesels must be operable. This requirement for diversity and redundancy during periods of refueling is beyond the required design basis of the plant. The associated Bases will also include a statement that, in Modes 5 and 6, the electrical power requirements do not require considering a single failure coincident with a loss of all offsite or all onsite power.

The note that is being proposed provides clarification relative to the electrical system requirements for the penetration room filtration system when it is aligned to the spent fuel pool room during refueling operations. This issue was suitably addressed when the Improved Westinghouse Standard Technical Specifications NUREG-1431, Revision 1 (ITS) were issued on April 7, 1995. This change is technically consistent with the requirements of the ITS.

The second of these proposed changes will extend the TS 3.9.13 completion time allowed for returning one out-of-service penetration room filtration system from 48 hours to 7 days. This specification is applicable during crane operation with loads over the fuel in the spent fuel pit and during fuel movement within the spent fuel pit. The 7 day completion time for this action is consistent with the existing TS 3.7.8, Penetration Room Filtration System (Modes 1-4). The 7 day completion time is based on the low likelihood of an event occurring during this time

Enclosure 1
Basis for Change Request

that would require this system to function, the fact that the remaining operable train is capable of automatically providing 100% of the required system function, and the capability exists to manually operate system components on the inoperable train, if required. This change will make the two TS requirements for this system (3.9.13 and 3.7.8) consistent and still provide a sufficient restriction upon plant operation to avoid an undue risk to public health and safety. This change is also technically consistent with the requirements of the ITS. The associated Bases will also include additional information regarding this change.

ENCLOSURE 2

Joseph M. Farley Nuclear Plant Request to Revise Technical Specifications and Associated Bases Storage Pool Ventilation (Fuel Movement)

10 CFR 50.92 Evaluation

Pursuant to 10 CFR 50.92 each application for amendment to an operating license must be reviewed to determine if the proposed change involves a significant hazards consideration. The amendment, as defined below, describing the Technical Specifications changes to the Storage Pool Ventilation during fuel movement requirements and the associated Bases, has been reviewed and deemed not to involve a significant hazards consideration. The basis for this determination follows.

BACKGROUND

One of the purposes of the penetration room filtration system is to ensure that radioactive material released as a result of a fuel handling accident in the spent fuel pool room will be filtered through the HEPA filters and charcoal absorbers prior to discharge to the atmosphere. Physically, for each unit, there are two systems which perform functions during normal operations and other functions during refueling operations. The governing specifications for these systems during normal operations in Modes 1-4 are TS 3/4.7.8, Penetration Room Filtration Systems. The governing specification during refueling operations is 3/4.9.12 and 3/4.9.13. The current specification, read literally -- using the definition of OPERABLE in the technical specification -- would require at least two offsite circuits through separate 1E distribution systems and at least two emergency diesels for the penetration room filtration system to be in an operable status when it is aligned to the spent fuel room during refueling operations.

Likewise, the completion time allowed for returning one out-of-service penetration room filtration system is 7 days during Modes 1-4 (TS 3.7.8). The current TS 3.9.13 requirement provides a 48 hour allowed outage time for one out-of-service penetration room filtration system during crane operation with loads over the fuel in the spent fuel pit and during fuel movement within the spent fuel pit. There is a low likelihood of an event occurring during this time that would require this system to function. The remaining operable train is capable of automatically providing 100% of the required system function and capability exists to manually operate system components on the inoperable train, if required.

DESCRIPTION OF CHANGE REQUEST

The first proposed change will specifically note that the normal or emergency power source may be inoperable in MODE 5 or 6 provided that the requirements of TS 3.8.1.2 are satisfied. Currently, the TSs do not specifically note that either the normal or emergency power sources may be inoperable during MODE 5 or 6. The Farley Nuclear Plant (FNP) design basis for electrical sources during refueling (TS 3.8.1.2) requires at least one offsite circuit through the 1E distribution system be operable and at least one of the emergency diesels be operable. The placement of this proposed note will clarify any misconceptions relative to the required electrical power sources. The associated Bases will also be modified to state that, in Modes 5 and 6, the electrical power requirements do not require considering a single failure coincident with a loss of all offsite or all onsite power. This issue was also suitably addressed when the Improved Westinghouse Standard Technical Specifications NUREG-1431, Revision 1 (ITS) were issued on April 7, 1995. This change is technically consistent with the requirements of the ITS.

The second proposed change will extend the TS 3.9.13 completion time allowed for returning one out-of-service penetration room filtration system from 48 hours to 7 days. This change will make the two TS requirements for this system (3.9.13 and 3.7.8) consistent and still provide a sufficient restriction upon plant operation to avoid an undue risk to public health and safety. This change is also technically consistent with the requirements of the ITS. The associated Bases will also be revised to state that during this period, the remaining OPERABLE train is adequate to perform the penetration room filtration (PRF) function and that the 7 day completion time is based on the low risk of an event occurring requiring the inoperable PRF train, and the capability of the remaining PRF train to provide the required protection.

ANALYSIS

Regarding the first proposed change, the allowance to have both penetration room filtration systems powered in accordance with TS 3.8.1.2, when they are aligned to the spent fuel pool room, is technically consistent with the FNP licensing basis. When a unit is shut down, TS 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

Enclosure 2
10 CFR 50.92 Evaluation

power is not required. This proposed change is technically consistent with the requirements of NUREG-1431, Revision 1 which has already received the requisite review and approval of the NRC staff.

Regarding the second proposed change, extending the TS 3.9.13 completion time allowed for returning one out-of-service penetration room filtration system from 48 hours to 7 days is consistent with the existing TS 3.7.8, Penetration Room Filtration System (Modes 1-4). The 7 day completion time is based on the low likelihood of an event occurring during this time that would require this system to function and the fact that the remaining operable train is capable of automatically providing 100% of the required system function. This change will make the two TS requirements for this system (3.9.13 and 3.7.8) consistent and still provide a sufficient restriction upon plant operation to avoid an undue risk to public health and safety. This change is technically consistent with the requirements of the ITS.

10 CFR 50.92 EVALUATION CONCLUSIONS

Based on the preceding evaluation, the following conclusions are provided with respect to the criteria contained in 10 CFR 50.92.

- (1) The proposed changes do not significantly increase the probability or consequences of an accident previously evaluated in the FSAR. The proposed changes have no impact on the probability of an accident. The storage pool ventilation system will continue to ensure that radioactive material released as a result of a fuel handling accident in the spent fuel pool room will be filtered through the HEPA filters and charcoal absorbers prior to discharge to the atmosphere. There is no change in the FNP design basis as a result of this change and, as a result, does not involve a significant increase in the consequences of an accident previously evaluated.
- (2) The proposed changes to the TSs do not increase the possibility of a new or different kind of accident than any accident already evaluated in the FSAR. No new limiting single failure or accident scenario has been created or identified due to the proposed changes. Safety-related systems will continue to perform as designed. The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

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- (3) The proposed changes do not involve a significant reduction in the margin of safety. As a result of these proposed changes, the penetration room filtration system, when it is aligned to the spent fuel pool room, will continue to require verification of operability. There is no impact in the accident analyses. These proposed changes are technically consistent with the requirements of NUREG-1431, Revision 1 which has already received the requisite review and approval of the NRC staff. Thus the proposed changes do not involve a significant reduction in the margin of safety.

Accordingly, Southern Nuclear has determined that the proposed changes with respect to the Storage Pool Ventilation during fuel movement TSs do not involve a significant hazards consideration.