B. L. "Pete" Ivey Vice President Regulatory Affairs Southern Nuclear Operating Company, Inc. 40 Inverness Center Parkway Post Office Box 1295 Birmingham, AL 35242

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August 27, 2013

Docket Nos.: 50-348 50-364 NL-13-1762

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

Joseph M. Farley Nuclear Plant - Units 1 and 2 First Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to <u>Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)</u>

References:

- NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012
- NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012
- 3. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012
- 4. Joseph M. Farley Nuclear Plant Units 1 and 2 Initial Status Report in Response to Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049), dated October 23, 2012
- Joseph M. Farley Nuclear Plant Units 1 and 2 Overall Integrated Plan in Response to Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049), dated February 27, 2013

Ladies and Gentlemen:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to Southern Nuclear Operating Company. Reference 1 was immediately effective and directs the Joseph M. Farley Nuclear Plant - Units 1 and 2 (FNP) to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C.1.a of Reference 1. Reference 2 endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2.

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Reference 4 provided the FNP initial status report regarding mitigation strategies. Reference 5 provided the FNP overall integrated plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports. The purpose of this letter is to provide the first six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The enclosed report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no NRC commitments. If you have any questions, please contact John Giddens at 205.992.7924.

Mr. B. L. Ivey states he is a Vice President of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and, to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

Mr. B. L. Ivey Vice President - Regulatory Affairs

BLI/CLN/lac

Sworn to and subscribed before me this 21^{+1} day of <u>August</u>, 2013.

Marcy Louise Hen Notary Public

My commission expires: March 23, 2014



- Enclosure: Joseph M. Farley Nuclear Plant Units 1 and 2 First Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)
- cc: Southern Nuclear Operating Company Mr. S. E. Kuczynski, Chairman, President & CEO Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer Mr. T. A. Lynch, Vice President – Farley Mr. C. R. Pierce, Regulatory Affairs Director Mr. B. J. Adams, Vice President – Fleet Operations RType: CVC7000

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U. S. Nuclear Regulatory Commission

Mr. E. Leeds, Director of the Office of Nuclear Reactor Regulations

Mr. V. M. McCree, Regional Administrator

Mr. R. E. Martin, NRR Senior Project Manager - Farley

Mr. P. K. Niebaum, Senior Resident Inspector - Farley

Mr. J. R. Sowa, Senior Resident Inspector - Farley

Ms. J. A. Kratchman, NRR/JLD/PMB

Mr. E. E. Bowman, NRR/DPR/PGCB

<u>Alabama Department of Public Health</u> Dr. D. E. Williamson, State Health Officer Joseph M. Farley Nuclear Plant - Units 1 and 2 First Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to <u>Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)</u>

Enclosure

Joseph M. Farley Nuclear Plant - Units 1 and 2 First Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)

Joseph M. Farley Nuclear Plant - Units 1 and 2 First Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to <u>Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)</u>

1 Introduction

Joseph M. Farley Nuclear Plant - Units 1 and 2 developed an Overall Integrated Plan (Reference 1 of this enclosure), documenting the diverse and flexible strategies (FLEX), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

In addition to the submittal of status reports, the following milestone(s) directly related to FLEX implementation have been completed since the development of the Overall Integrated Plan (Reference 1), and are current as of June 30, 2013:

None

3 Milestone Schedule Status

The following provides an update to Attachment 2 of the Overall Integrated Plan. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed. The revised milestone target completion date does not impact the Order implementation date.

Target Completion Date	Activity Status	Revised Target Completion Date
Oct 2012	Complete	N/A
Feb 2013	Complete	N/A
May 2013	Complete	N/A
Aug 2013	Complete (see Sec. 2)	N/A
Sep 2013	Started	
Nov 2013	Started	Jun 2014
Dec 2013	Started	
Jan 2014	Started	
Feb 2014	Not Started	
Mar 2014	Started	
Aug 2014	Not Started	
Sep 2014	Not Started	
Nov 2014	Not Started	
Nov 2014	Not Started	
Nov 2014	Not Started	
Feb 2015	Not Started	
Apr 2015	Not Started	
Apr 2015	Not Started	
	Not Started	
	Completion Date Oct 2012 Feb 2013 May 2013 Aug 2013 Sep 2013 Nov 2013 Dec 2013 Jan 2014 Feb 2014 Mar 2014 Sep 2014 Nov 2014 Nov 2014 Sep 2014 Aug 2014 Feb 2014 Mar 2014 Feb 2014 Nov 2014 Nov 2014 Nov 2014 Feb 2015 Apr 2015	Completion DateActivity StatusOct 2012CompleteFeb 2013CompleteMay 2013CompleteMay 2013CompleteAug 2013CompleteAug 2013StartedSep 2013StartedDec 2013StartedJan 2014StartedFeb 2014Not StartedMar 2014StartedSep 2014Not StartedJan 2014StartedMar 2014StartedMar 2014Not StartedNov 2014Not StartedNov 2014Not StartedNov 2014Not StartedNov 2014Not StartedFeb 2015Not StartedApr 2015Not StartedApr 2015Not Started

*Full compliance after second listed refueling outage

4 Changes to Compliance Method

There are no changes to the compliance method as documented in the Overall Integrated Plan (Reference 1 of this enclosure).

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

Joseph M. Farley Nuclear Plant - Units 1 and 2 expects to comply with the order implementation date and no relief/relaxation is required at this time.

6 Open Items from Overall Integrated Plan and Draft Safety Evaluation

The following tables provide a summary of the open items documented in the Overall Integrated Plan or the Draft Safety Evaluation (SE) and the status of each item.

Overall Integrated Plan Open Item	Status
 Structure, content and details of the Regional	SAFER Team developing Pilot
Response Center playbook will be determined.	Playbook

Draft Safety Evaluation Open Item	Status
None Received to date	N/A

7 Potential Draft Safety Evaluation Impacts

There are no potential impacts to the Draft Safety Evaluation identified at this time.

8 References

The following references support the updates to the Overall Integrated Plan described in this enclosure.

- Joseph M. Farley Nuclear Plant Units 1 and 2 Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated February 27, 2013.
- NRC Order Number EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012.

9 Other Additional Information

The following information provides clarity or corrections to the Overall Integrated Plan but do not constitute a change in strategy:

First Six-Month Status Report of FLEX Implementation

1. The following Key Parameters instrument numbers have been changed:

Steam Generator Essential Instrumentation	Safety Function
AFW Flow to SGs (FEI-3229A, B, & C)	Core Cooling
Condensate Storage Tank Essential Instrumentation	Safety Function
CST Level (LI- 5154 132A and LI- 5164 132B)	Core Cooling

- 2. The Accumulator discharge isolation valves are not required to be powered by FLEX DGs under the strategy.
- 3. The primary borated water source is approximately 11,000 gallons of highly borated water available in the Boric Acid Storage Tanks (BAST/BAT) versus the 2,000 gallons stated in the February 27, 2013 Overall Integrated Plan submittal.