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FEB 2 6 2015

Docket Nos.: 50-348 50-364 NL-15-0239

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

> Joseph M. Farley Nuclear Plant - Units 1 and 2 Fourth Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to <u>Reliable Spent Fuel Pool Instrumentation (EA-12-051)</u>

#### **References:**

- 1. NRC Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, dated March 12, 2012.
- 2. NRC Interim Staff Guidance JLD-ISG-2012-03, Compliance with Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, Revision 0, dated August 29, 2012.
- 3. NEI 12-02, Industry Guidance for Compliance with NRC Order EA-12-051, To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, Revision 1, dated August 2012.
- 4. Joseph M. Farley Nuclear Plant Units 1 and 2 Initial Status Report in Response to Commission Order with Regard to Reliable Spent Fuel Pool Instrumentation (EA-12-051), dated October 23, 2012.
- 5. Joseph M. Farley Nuclear Plant Units 1 and 2 Overall Integrated Plan in Response to Commission Order with Regard to Reliable Spent Fuel Pool Instrumentation (EA-12-051), 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 install reliable spent fuel pool instrumentation. Specific requirements are outlined in Attachment 2 of Reference 1.

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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 12-02, Revision 1 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the FNP initial status report regarding spent fuel pool instrumentation 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 fourth sixmonth status report pursuant to Section IV, Condition C.2, of Reference 1, delineating 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 new NRC commitments. If you have any questions, please contact John Giddens at 205.992.7924.

Mr. C. R. Pierce states he is the Regulatory Affairs Director for 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,

CR. Piere

C. R. Pierce Regulatory Affairs Director

CRP/JMG/GLS

Sworp to and subscribed before me this 24 day of deliverary 2015.

My commission expires: 10-8-2017

Enclosure: Joseph M. Farley Nuclear Plant - Units 1 and 2 Fourth Six-Month Status Report Regarding Reliable Spent Fuel Pool Instrumentation (EA-12-051) U. S. Nuclear Regulatory Commission NL-15-0239 Page 3

- cc: Southern Nuclear Operating Company
  - Mr. S. E. Kuczynski, Chairman, President & CEO
  - Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer
  - Ms. C. A. Gayheart, Vice President Farley
  - Mr. M. D. Meier, Vice President Regulatory Affairs
  - Mr. D. R. Madison, Vice President Fleet Operations
  - Mr. B. J. Adams, Vice President Engineering
  - Mr. R. R. Martin, Regulatory Manager Farley
  - RTYPE: CFA04.054

U. S. Nuclear Regulatory Commission

Mr. W. M. Dean, Director of the Office of Nuclear Reactor Regulations

Mr. V. M. McCree, Regional Administrator

Mr. S. A. Williams, NRR Project Manager – Farley

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

- Mr. B. A. Purnell, NRR/JLD/PMB
- Mr. S. R. Jones, NRR/DSS/SBPB

Alabama Department of Public Health

Dr. D. E. Williamson, State Health Officer

Joseph M. Farley Nuclear Plant - Units 1 and 2 Fourth Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to <u>Reliable Spent Fuel Pool Instrumentation (EA-12-051)</u>

#### Enclosure

Joseph M. Farley Nuclear Plant - Units 1 and 2 Fourth Six-Month Status Report Regarding Reliable Spent Fuel Pool Instrumentation (EA-12-051)

#### Joseph M. Farley Nuclear Plant - Units 1 and 2 Fourth Six-Month Status Report Regarding Reliable Spent Fuel Pool Instrumentation (EA-12-051)

#### 1 Introduction

Joseph M. Farley Nuclear Plant Units 1 and 2 developed an Overall Integrated Plan (Reference 1 of this enclosure), documenting the requirements to install reliable spent fuel pool (SFP) instrumentation, in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the last status report, 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 SFP instrumentation implementation have been completed since the previous 6-month update, and are current as of December 2014:

- Receipt of Unit 2 SFP Instrument Channel
- Develop Modifications Unit 1
- Receipt of Unit 1 SFP Instrument Channel
- Complete Functional Test of Unit 2 SFP Instruments
- Unit 2 Implementation Complete (2nd RFO)

### 3 Milestone Schedule Status

The following provides an update to the milestone schedule to support the Overall Integrated Plan. This section 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.

| Milestone   | Target<br>Completion<br>Date | Activity<br>Status | Revised Target<br>Completion<br>Date |
|---|------------------------------|--------------------|--------------------------------------|
| Submit 60 Day Status Report                           | Oct 2012                     | Complete           | N/A                                  |
| Submit Overall Integrated Plan                        | Feb 2013                     | Complete           | N/A                                  |
| Unit 2 1st RFO  | May 2013                     | Complete           | N/A                                  |
| Submit 6 Month Status Report                          | Aug 2013                     | Complete           | N/A                                  |
| Unit 1 1st RFO  | Nov 2013                     | Complete           | N/A                                  |
| Develop Modifications Unit 2                          | May 2014                     | Complete           | N/A                                  |
| Submit 6 Month Status Report                          | Feb 2014                     | Complete           | N/A                                  |
| Receipt of Unit 2 SFP Instrument Channel              | July 2014                    | Complete           | N/A                                  |
| Develop Modifications Unit 1                          | Oct 2014                     | Complete           | N/A                                  |
| Receipt of Unit 1 SFP Instrument Channel              | July 2014                    | Complete           | N/A                                  |
| Complete Functional Test of Unit 2 SFP<br>Instruments | 3Q 2014                      | Complete           | N/A                                  |
| Submit 6 Month Status Report                          | Aug 2014                     | Complete           | N/A                                  |
| Unit 2 Implementation Complete (2nd RFO)*             | Nov 2014                     | Complete           | N/A                                  |

| Milestone   | Target<br>Completion<br>Date | Activity<br>Status | Revised Target<br>Completion<br>Date |
|---|------------------------------|--------------------|--------------------------------------|
| Submit 6 Month Status Report                          | Feb 2015                     | Complete           | N/A                                  |
| Complete Functional Test of Unit 1 SFP<br>Instruments | 1Q 2015                      | Not Started        | N/A                                  |
| Unit 1 Implementation Complete (2nd RFO)*             | Apr 2015                     | Not Started        |                                      |
| Submit Completion Report                              | Jun 2015                     | Not 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 Unit 1 expects to comply with the order implementation date and no relief/relaxation is required at this time. As noted in Section 2, the Milestones accomplished by December 31, 2014 are included in this report. Prior to that time, Unit 2 of the Joseph M. Farley Nuclear Plant had completed the implementation of this Order; however, the compliance letter had not yet been submitted to the NRC.

## 6 Open Items from Interim Staff Evaluation

As discussed with the NRC staff, the Interim Staff Evaluation (ISE) Open Items for SFP Instrumentation are the only remaining issues. The NRC provided seventeen (17) requests for additional information (RAIs) by letter on October 30, 2013. These RAIs have been addressed by separate SNC E-Portal postings on March 25, 2014 and June 29, 2104.

## 7 Potential Interim Staff Evaluation Impacts

There are no potential impacts to the Interim Staff Evaluation identified at this time except for those identified in Section 6.

### 8 References

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

- 1. 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 Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 27, 2013.
- 2. NRC Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, dated March 12, 2012.
- Interim Staff Evaluation and Request for Additional Information Farley Nuclear Plant, Units 1 and 2 (FNP) Regarding Overall Integrated Plan (OIP) for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051) (TAC NOS. MF1429 and MF 1430), dated October 30, 2013.

# 9 Other Additional Information

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

• Although not explicitly stated in the response to RAI 5 posted on the Portal on June 29, 2014, neither Joseph M. Farley Nuclear Plant unit will be using a stilling well.