UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
245 PEACHTREE CENTER AVENUE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

May 13, 2011

Mr. L. Michael Stinson
Interim Vice President - Farley
Southern Nuclear Operating Company, Inc.
7388 North State Highway 95
Columbia, AL 36319

SUBJECT: JOSEPH M. FARLEY NUCLEAR PLANT – NRC TEMPORARY INSTRUCTION 2515/183 INSPECTION REPORT 05000348/2011011 AND 05000364/2011011

Dear Mr. Stinson:

On April 29, 2011, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Joseph M. Farley Nuclear Plant, Units 1 and 2, using Temporary Instruction 2515/183, "Follow-up to the Fukushima Daiichi Nuclear Station Fuel Damage Event." The enclosed inspection report documents the inspection results which were discussed on May 5, 2011, with you and other members of your staff.

The objective of this inspection was to promptly assess the capabilities of Joseph M. Farley Nuclear Plant, Units 1 and 2, to respond to extraordinary consequences similar to those that have recently occurred at the Japanese Fukushima Daiichi Nuclear Station. The results from this inspection, along with the results from this inspection performed at other operating commercial nuclear plants in the United States will be used to evaluate the U.S. nuclear industry's readiness to safely respond to similar events. These results will also help the NRC to determine if additional regulatory actions are warranted.

All of the potential issues and observations identified by this inspection are contained in this report. The NRC's Reactor Oversight Process will further evaluate any issues to determine if they are regulatory findings or violations. Any resulting findings or violations will be documented by the NRC in a separate report. You are not required to respond to this letter.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS), accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

/RA/

Scott M. Shaeffer, Chief
Reactor Projects Branch 2
Division of Reactor Projects

Docket No.: 50-348, 50-364
License No.: NPF-2, NPF-8

Enclosure: Inspection Report 05000348/2011011 and 05000364/20110011
w/Attachment: Supplemental Information

cc w/encl: (See page 3)

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X PUBLICLY AVAILABLE ☐ NON-PUBLICLY AVAILABLE ☐ SENSITIVE X NON-SENSITIVE

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NAME	ECrowe	SShaeffer					
DATE	05/11/2011	05/12/2011					
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

OFFICIAL RECORD COPY DOCUMENT NAME: G:\DRPII\RPB2\FARLEY\REPORTS\TI-183\FARLEY TI-183 INSPECTION REPORT (FINAL).DOCX

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(cc w/encl continued next page)

(cc w/encl continued)

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Letter to L. Mike Stinson from Scott M. Shaeffer dated May 13, 2011

SUBJECT: JOSEPH M. FARLEY NUCLEAR PLANT – NRC TEMPORARY INSTRUCTION 2515/183 INSPECTION REPORT 05000348/2011011 AND 05000364/2011011

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U.S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket Nos.:	05000348, 05000364
License Nos.:	NPF-2, NPF-8
Report No.:	05000348/2011011 and 05000364/2011011
Licensee:	Southern Nuclear Operating Company, Inc.
Facility:	Joseph M. Farley Nuclear Plant, Units 1 and 2
Location:	Columbia, AL
Dates:	April 4, 2011 through April 29, 2011
Inspectors:	E. Crowe, Senior Resident Inspector
Approved by:	Scott M. Shaeffer, Chief Reactor Projects Branch 2 Division of Reactor Projects

Enclosure

SUMMARY OF FINDINGS

IR 05000348/2011011, 05000364/2011011; 04/04/2011 – 04/29/2011, Joseph M. Farley Nuclear Plant, Units 1 and 2, Temporary Instruction 2515/183 – Follow-up to the Fukushima Daiichi Nuclear Station Fuel Damage Event.

This report covers an announced Temporary Instruction inspection. The inspection was conducted a senior resident inspector. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

INSPECTION SCOPE

The intent of the TI is to provide a broad overview of the industry's preparedness for events that may exceed the current design basis for a plant. The focus of the TI was on (1) assessing the licensee's capability to mitigate consequences from large fires or explosions on site, (2) assessing the licensee's capability to mitigate station blackout (SBO) conditions, (3) assessing the licensee's capability to mitigate internal and external flooding events accounted for by the station's design, and (4) assessing the thoroughness of the licensee's walk downs and inspections of important equipment needed to mitigate fire and flood events to identify the potential that the equipment's function could be lost during seismic events possible for the site. If necessary, a more specific follow-up inspection will be performed at a later date.

INSPECTION RESULTS

All of the potential issues and observations identified by this inspection are contained in this report. The NRC's Reactor Oversight Process will further evaluate any issues to determine if they are regulatory findings or violations. Any resulting findings or violations will be documented by the NRC in a separate report.

INSPECTION RESULTS

The following table documents the NRC inspection at Joseph M. Farley Nuclear Plant, Units 1 and 2, performed in accordance with TI 2515/183. The numbering system in the table corresponds to the inspection items in the TI.

03.01 Assess the licensee's capability to mitigate conditions that result from beyond design basis events, typically bounded by security threats, committed to as part of NRC Security Order Section B.5.b issued February 25, 2002, and severe accident management guidelines and as required by Title 10 of the Code of Federal Regulations (10 CFR) 50.54(hh). Use Inspection Procedure (IP) 71111.05T, "Fire Protection (Triennial)," Section 02.03 and 03.03 as a guideline. If IP 71111.05T was recently performed at the facility the inspector should review the inspection results and findings to identify any other potential areas of inspection. Particular emphasis should be placed on strategies related to the spent fuel pool. The inspection should include, but not be limited to, an assessment of any licensee actions to:	
Licensee Action	Describe what the licensee did to test or inspect equipment.
a. Verify through test or inspection that equipment is available and functional. Active equipment shall be tested and passive equipment shall be walked down and inspected. It is not expected that permanently installed equipment that is tested under an existing regulatory testing program be retested.	Licensee personnel completed testing and inspections of equipment associated with Severe Accident Management Guidelines (SAMGs), Emergency Planning procedures, and Abnormal Operating procedures related to the scope of this report item to confirm readiness to execute the procedures. Three active pieces of equipment exist for these strategies. One piece is permanently installed and tested per the licensee's planned maintenance program. The other two active pieces of equipment were operated to verify readiness. The licensee performed an inventory of all passive equipment utilized in these strategies. The licensee completed a review and walk down of SAMGs, Emergency Planning procedures and Abnormal Operating procedures related to the scope of this report item to confirm readiness to execute the procedures.
	Describe inspector actions taken to confirm equipment readiness (e.g., observed a test, reviewed test results, discussed actions, reviewed records, etc.).

This review should be done for a reasonable sample of mitigating strategies/equipment.		The inspectors reviewed the licensee's report documenting the completion of the above activities. The inspectors also scanned the above procedures to gain understanding of the strategies and to identify potential equipment for sampling its readiness. The inspectors interviewed station personnel involved in the walk downs and testing of equipment. The inspectors also visually inspected passive equipment to evaluate its condition and readiness for use. The inspectors reviewed all condition reports written by the licensee related to this verification. The inspectors reviewed planned licensee actions.
		Discuss general results including corrective actions by licensee.
		The licensee discovered a small number of discrepancies which were entered into the licensee's corrective action program (i.e air line tubing leak on the emergency air compressor; clamp on style of flow meter non-functional, equipment labeling issues). The licensee recognized some enhancements which would make equipment and procedures more functional. These items were also captured in the licensee corrective action program.

Licensee Action		Describe the licensee's actions to verify that procedures are in place and can be executed (e.g. walkdowns, demonstrations, tests, etc.)
b. Verify through walkdowns or demonstration that procedures to implement the strategies associated with B.5.b and 10 CFR 50.54(hh) are in place and are executable. Licensees may choose not to connect or operate permanently installed equipment during this verification. This review should be done for a reasonable sample of mitigating strategies/equipment.		Senior operations personnel reviewed station procedures utilized in these strategies and performed walk downs to confirm the readiness to execute the procedures. Operations personnel walked down procedures to verify equipment connections could be properly made with equipment provided.
		Describe inspector actions and the sample strategies reviewed. Assess whether procedures were in place and could be used as intended.
		The inspectors reviewed each of the station procedures identified by the above senior operations personnel. The review included an evaluation of the planned strategies and how well the strategy encompassed potential events. The review also included an evaluation of the thoroughness of each procedure and potential for actions of one procedure to preclude implementation of another procedure. Additionally, the inspectors reviewed licensee procedures/strategies for addressing spent fuel pool emergencies. The inspectors reviewed all condition reports written by the licensee related to this verification. The inspectors reviewed planned licensee actions.

		Discuss general results including corrective actions by licensee.
		The licensee identified procedural enhancements which mainly encompassed procedure quality. The majority of the enhancements emphasized increased detail to provide the user with high quality information. The more notable issues included proper alignment of the portable pump suction sources (i.e. pressurized versus non-pressurized and the possible use of a suction regulator); the desire to make available nitrogen bottles as a backup to the emergency air system for operation of the atmospheric relief valves; and the inability of the abnormal operating procedure for control room inaccessibility to address "loss of all AC power concurrent with loss of the control room." The license captured these enhancements in their corrective action program.
Licensee Action		Describe the licensee's actions and conclusions regarding training and qualifications of operators and support staff.
c. Verify the training and qualifications of operators and the support staff needed to implement the procedures and work instructions are current for activities related to Security Order Section B.5.b and severe accident management guidelines as required by 10 CFR 50.54 (hh).		The licensee reviewed their database to identify the number of qualified individuals for required positions such as system operators, reactor operators, shift technical advisors, maintenance, health physics, chemistry, fire protection, security and emergency response personnel. These numbers were verified to meet minimum required staffing numbers. Personnel qualifications were then verified to be current in the licensee's training database (plateau).
		Describe inspector actions and the sample strategies reviewed to assess training and qualifications of operators and support staff
		The inspectors reviewed training material related to the implementation of SAMGs, Emergency Planning procedures, and B.5.b strategies. The inspectors also reviewed the table created in the licensee's review above to ensure that reasonable numbers of appropriate staff were provided. The inspectors interviewed station management related to the content of training for each site discipline and the periodicity of the training.
		Discuss general results including corrective actions by licensee.
		All require personnel were found to be qualified and no gaps were noted.

Licensee Action		Describe the licensee's actions and conclusions regarding applicable agreements and contracts are in place.
d. Verify that any applicable agreements and contracts are in place and are capable of meeting the conditions needed to mitigate the consequences of these events. This review should be done for a reasonable sample of mitigating strategies/equipment.		The licensee reviewed all memorandums of understanding (MOU) related to the scope of this item. The licensee compared these MOUs to station strategies and/or procedural requirements to identify any gaps or potential enhancements.
		For a sample of mitigating strategies involving contracts or agreements with offsite entities, describe inspector actions to confirm agreements and contracts are in place and current (e.g., confirm that offsite fire assistance agreement is in place and current).
		The inspectors obtained copies of each of the licensee's MOUs and compared services/equipment requested to those outlined in station procedures/strategies.
		Discuss general results including corrective actions by licensee.
		The licensee identified all MOUs were adequate to meet site needs to implement strategies. The licensee did identify an enhancement that would improve one strategy related to radiological release.
Licensee Action		Document the corrective action report number and briefly summarize problems noted by the licensee that have significant potential to prevent the success of any existing mitigating strategy.
e. Review any open corrective action documents to assess problems with mitigating strategy implementation identified by the licensee. Assess the impact of the problem on the mitigating capability and the remaining capability that is not impacted.		The inspectors reviewed the licensee's condition reports written associated with equipment testing, strategy walk downs, personnel qualifications and memorandums of understanding (MOUs). All were deemed by the licensee to be enhancements to existing strategies. The inspectors determined than no significant potential to prevent the success of any existing mitigating strategy was identified. The inspectors reviewed planned corrective actions associated with these enhancements and determined the planned corrective actions were adequate.

03.02 Assess the licensee's capability to mitigate station blackout (SBO) conditions, as required by 10 CFR 50.63, "Loss of All Alternating Current Power," and station design, is functional and valid. Refer to TI 2515/120, "Inspection of Implementation of Station Blackout Rule Multi-Plant Action Item A-22," as a guideline. It is not intended that TI 2515/120 be completely reinspected. The inspection should include, but not be limited to, an assessment of any licensee actions to:		
Licensee Action		Describe the licensee's actions to verify the adequacy of equipment needed to mitigate an SBO event.
a. Verify through walkdowns and inspection that all required materials are adequate and properly staged, tested, and maintained.		The licensee reviewed and walked down all procedures related to the mitigation of a station blackout. The station blackout diesel and related equipment necessary to support the SBO procedures were also walked down. Additionally, the licensee evaluated the material condition of the station emergency diesel generators during these walk downs.
		Describe inspector actions to verify equipment is available and useable.
		The inspectors obtained copies of station procedures that implement the various strategies for loss of 4160 volt electrical buses and off site electrical power. The inspectors reviewed these procedures to evaluate thoroughness of licensee strategies. The inspectors reviewed the licensee's SBO coping study to identify the planned strategy and equipment necessary for its implementation including the required duration of time needed. The inspectors identified that all required equipment is permanently installed in the plant. The inspectors also inspected the emergency diesel generators and attendant equipment to evaluate equipment readiness. The inspectors also inspected the emergency air compressors to evaluate the equipment readiness and ability to supply backup air to the turbine driven auxiliary feedwater (TDAFW) steam supply valves.
		Discuss general results including corrective actions by licensee.
		The licensee identified no gaps or deficiencies.

Licensee Action		Describe the licensee's actions to verify the capability to mitigate an SBO event.
b. Demonstrate through walkdowns that procedures for response to an SBO are executable.		The licensee reviewed and walked down all procedures related to the mitigation of a station blackout. The station blackout diesel and related equipment necessary to support the SBO procedures were also walked down.
		Describe inspector actions to assess whether procedures were in place and could be used as intended.
		The inspectors obtained copies of station procedures that implement the various strategies for loss of 4160 volt electrical buses and off site electrical power. The inspectors reviewed these procedures to evaluate thoroughness of licensee strategies. The inspectors reviewed the licensee's SBO coping study to identify the planned strategy and equipment necessary for its implementation including the required duration of time needed.
		Discuss general results including corrective actions by licensee.
		The licensee identified no gaps or deficiencies.

03.03 Assess the licensee's capability to mitigate internal and external flooding events required by station design. Refer to IP 71111.01, "Adverse Weather Protection," Section 02.04, "Evaluate Readiness to Cope with External Flooding," as a guideline. The inspection should include, but not be limited to, an assessment of any licensee actions to verify through walkdowns and inspections that all required materials and equipment are adequate and properly staged. These walkdowns and inspections shall include verification that accessible doors, barriers, and penetration seals are functional.		
Licensee Action		Describe the licensee's actions to verify the capability to mitigate existing design basis flooding events.
a. Verify through walkdowns and inspection that all required materials are adequate and properly staged, tested, and maintained.		The licensee utilized teams to conduct walk downs. The scope of the walk downs and associated acceptance criteria were defined by the licensee request for engineering review (RER) CR 110603501. Accessible areas of Units 1 and 2 Auxiliary Buildings, Emergency Diesel Generator Building, Service Water Intake Structure, River Water Intake Structure and site grounds were investigated. Condition reports were written and entered into the CAP for deficiencies identified. No items were identified that failed to meet the current flood analysis.

		Describe inspector actions to verify equipment is available and useable. Assess whether procedures were in place and could be used as intended.
		The inspectors reviewed the licensee internal flooding analysis to determine strategies and required equipment for the strategies. The inspectors noted the only equipment involved in the strategy included water tight doors for emergency safeguards features. The inspectors inspect these doors during plant tours to ensure the operability of the doors and their adequacy to meet the internal flooding analysis. The inspectors inspected a sample of the floor drains and reviewed condition reports written by the licensee related to potential debris blockage of floor drains. The inspectors also reviewed the licensee's Final Safety Analysis Report (FSAR) Section 2.4, Hydrologic Engineering, with emphasis upon site topography, proximity to the Chattahoochee River and it dams, flood history, and probable maximum precipitation. The inspectors evaluated the elevation of site buildings and structures related to the above information. The inspectors also walked down the protected area storm drains to ensure grating was free of debris and would provide proper drainage. Additionally, the inspectors reviewed station procedures which involved strategies to combat internal flooding to ensure their adequacy to maintain necessary and appropriate equipment operable. The inspectors reviewed planned corrective actions associated with these minor deficiencies and determined the planned corrective actions were adequate.
		Discuss general results including corrective actions by licensee.
		The licensee noted minor discrepancies related to house keeping with potential debris that may clog floor drains. The licensee noted some storm drains were partially blocked by metal plates (for security purposes). The licensee identified four blocked floor drains in the service water intake structure and one in the Auxiliary Building of Unit 2. The licensee identified minor procedure deficiencies in FNP-0-AOP-21.0, Severe Weather. The licensee entered all discrepancies in their corrective action program.

03.04 Assess the thoroughness of the licensee's walkdowns and inspections of important equipment needed to mitigate fire and flood events to identify the potential that the equipment's function could be lost during seismic events possible for the site. Assess the licensee's development of any new mitigating strategies for identified vulnerabilities (e.g., entered it in to the corrective action program and any immediate actions taken). As a minimum, the licensee should have performed walkdowns and inspections of important equipment (permanent and temporary) such as storage tanks, plant water intake structures, and fire and flood response equipment; and developed mitigating strategies to cope with the loss of that important function. Use IP 71111.21, "Component Design Basis Inspection," Appendix 3, "Component Walkdown Considerations," as a guideline to assess the thoroughness of the licensee's walkdowns and inspections.	
Licensee Action	Describe the licensee's actions to assess the potential impact of seismic events on the availability of equipment used in fire and flooding mitigation strategies.
a. Verify through walkdowns that all required materials are adequate and properly staged, tested, and maintained.	The licensee staff reviewed the Fire and Flood design basis with support from Southern Nuclear Engineering. Teams were assembled to walk down and inspect all accessible structures, systems, and components. The walk down focused on degraded material conditions that could impact the ability of fire or flood mitigation equipment to function in the event of a seismic event. All accessible areas/rooms in the Auxiliary Building, Turbine Building, Service Water Intake Structure, River Water Intake Structure, Fire Pump House, Condensate Storage Tanks, Reactor Makeup Water Storage Tanks, Refueling Water Storage Tanks, Fire Protection, and B.5.b storage were walked down by the licensee's staff. Permanent and portable equipment were inspected by the staff.
	Describe inspector actions to verify equipment is available and useable. Assess whether procedures were in place and could be used as intended.
	The inspectors reviewed the licensee's Final Safety Analysis Report (FSAR) Section 3.2, Classification of Structures, Components and System, with emphasis on the related seismic classification. The inspectors reviewed the licensee's report documenting the completion of the above activities. The inspectors also reviewed SAMGs, Emergency Planning procedures, and Abnormal Operating procedures to evaluated licensee strategies and equipment utilized with these associated procedures. The inspectors determined that licensee activities were thorough.

		Discuss general results including corrective actions by licensee. Briefly summarize any new mitigating strategies identified by the licensee as a result of their reviews.
		The licensee inspections and reviews reveal that Plant Farley has the equipment, procedures, and agreements to respond to a design basis fire or flood event following a seismic event (no gaps identified). The licensee was planning additional reviews with the protected area yard's non-seismic fire protection piping. Enhancement opportunities exist in responding to multi-unit events beyond design basis, procedure clarification, equipment staging for seismic event, and housekeeping. Licensee staff also recognized training opportunities for additional SMAGs and accidents beyond design basis.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee personnel
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E. Berry, Engineering Support Supervisor
D. Hobson, Operations Superintendent
J. Hutto, Operations Manager
R. Martin, Rapid Response Manager
S. Odom, Emergency Preparedness Supervisor
W. Oldfield, Fleet Oversight Supervisor

NRC personnel
Scott M. Shaeffer, Chief, Branch 2, Division of Reactor Projects

LIST OF DOCUMENTS REVIEWED

Condition Reports:
2010115123, 2011100008, 2011100124, 2011103612, 2011103621, 2011103632, 2011103652, 2011103690, 2011103721, 2011103731, 2011103736, 2011103743, 2011103747, 2011103754, 2011103760, 2011103761, 2011103762, 2011103764, 2011103769, 2011103788, 2011103798, 2011103804, 2011103805, 20111103806, 2011103832, 2011104226, 2011104251, 2011104252, 2011104254, 2011104256, 2011104275, 2011104277, 2011104278, 2011104282, 2011104426, 2011104432, 2011104435, 2011104438, 2011104443, 2011104447, 2011104450, 2011104485, 2011104506, 2011104613, 2011104614, 2011104620, 2011104623, 2011104625, 2011104635, 2011104712, 2011104912

Documents:
Agreement Between Southern Nuclear Operating Company and the Board of Trustees of the University of Alabama for Radiation Casualty Treatment Facility at University Hospital, Birmingham, Alabama, dated November 15, 1999
Agreement for Ambulance Service Between Dothan Ambulance Service, Inc. and Alabama Power Company, dated October 1, 1986
Agreement for Ambulance/Rescue Squad Service with Ashford, Alabama, dated January 9, 2007
Agreement for Ambulance/Rescue Squad Service with Columbia, Alabama, dated December 7, 2006
Agreement with Southeast Alabama Medical Center, dated February 12, 2004
Pilcher's Dothan Ambulance Service agreement, dated September 24, 2004
RER CR110603501, Walkdown Information for Inspection of Internal and External Flooding Features – In Support of INPO IER 11-1 Recommendation Number 3
Resolution 2004-6, Agreement for Back-up Fire Protection Services with City of Dothan, Alabama, dated January 6, 2004

Procedures:
FNP-0-AOP-49.2, Complete Loss of Service Water, Version 3.0
FNP-0-ARP-2.3, Emergency Power Board Annunciator Panel X, Version 14.0
FNP-0-ARP-9.0, River Water Structure, Version 11.0
FNP-0-EIP-16.0, Emergency Equipment and Supplies, Version 58.0
FNP-0-SAG-1.0, Inject Into the Steam Generators, Version 3.0
FNP-0-SAG-2.0, Depressurize the RCS, Version 0.0
FNP-0-SAG-3.0, Inject Into the RCS, Version 3.0
FNP-0-SAG-4.0, Inject Into Containment, Version 3.0
FNP-0-SAG-5.0, Reduce Fission Product Releases, Version 4.0
FNP-0-SCG-1.0, Mitigate fission Product Releases, Version 4.0
FNP-0-SCG-2.0, Depressurize Containment, Version 3.0
FNP-0-SCG-4.0, Control Containment Vacuum, Version 0.0
FNP-1-AOP-5.0, Loss of A or B Train Electrical Power, Version 27.0
FNP-1-AOP-10.0, Loss of Service Water, Version 15.0
FNP-1-AOP-49.3, Spent Fuel Pool Emergency, Version 3.0
FNP-1-AOP-5.0, Loss of A or B Train Electrical Power, Version 23.0
FNP-1-ARP-1.1, Main Control Board Annunciator Panel A, Version 52.0
FNP-1-ARP-3.1, Balance of Plant Panel L, Version 31.0
FNP-1-ARP-3.2, Balance of Plant Annunciator Panel N, Version 29.0

FNP-2-AOP-5.0, Loss of A or B Train Electrical Power, Version 24.0
FNP-2-AOP-10.0, Loss of Service Water, Version 17.0
FNP-2-ARP-1.1, Main Control Board Annunciator Panel A, Version 33.0
FNP-2-ARP-3.1, Balance of Plant Panel L, Version 47.0
FNP-2-ARP-3.2, Balance of Plant Panel N, Version 21.0
FNP-2-ECP-0.0, Loss of All AC Power, Version 22.0
NMP-EP-402, Emergency Management Guideline, Version 8.0

Work Orders:
1102565801, 2103551401