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December 30, 2014

Docket Nos.: 50-321
50-366

NL-14-1839

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

Edwin I. Hatch Nuclear Plant – Units 1 and 2
First Six-Month Status Report of the Implementation of the
Commission Order with Regard to Requirements for
Reliable Hardened Containment Vents (EA-13-109)

References:

1. NRC Order Number EA-13-109, *Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions*, dated June 6, 2013.
2. NRC Interim Staff Guidance JLD-ISG-2013-02, *Compliance with Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions, Revision 0*, dated November 2013.
3. NEI 13-02, *Industry Guidance for Compliance with NRC Order EA-13-109, To Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions, Revision 0*, dated November 2013.
4. SNC Letter, *Edwin I. Hatch Nuclear Plant – Units 1 and 2 Phase 1 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Requirements for Reliable Hardened Containment Vents (EA-13-109)*, dated June 27, 2014.

Ladies and Gentlemen:

On June 6, 2013, the Nuclear Regulatory Commission (NRC) issued an Order (Reference 1) to Southern Nuclear Operating Company (SNC). Reference 1 was immediately effective and directs the Edwin I. Hatch Nuclear Plant - Units 1 and 2 (HNP) to install a reliable hardened venting capability for pre-core damage and under severe accident conditions, including those involving a breach of the reactor vessel by molten core debris. Specific requirements are outlined in Attachment 2 of Reference 1.

In addition, Reference 1 also required submission of a Phase 1 overall integrated plan pursuant to Section IV, Condition D, and status reports at six-month intervals thereafter. SNC submitted the overall integrated plan by letter dated June 27, 2014 (Reference 4). Enclosed is the first six-month status report pursuant to Section IV, Condition D, of Reference 1, reflecting: (1) progress associated with implementation of the requirements of Reference 1, and (2) milestone accomplishments subsequent to issuance of the

Phase 1 overall integrated plan (Reference 4), consistent with the guidance provided in References 2 and 3.

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

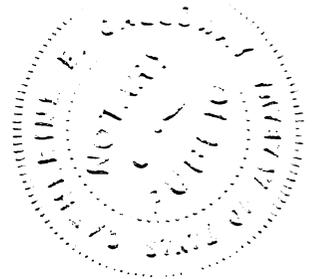
Mr. C. R. Pierce states he is the Regulatory Affairs Director for Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and, to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

C. R. Pierce

C. R. Pierce
Regulatory Affairs Director

CRP/JMG/TWS



Sworn to and subscribed before me this 30th day of December, 2014.

Cheri Betty
Notary Public

My commission expires: 1/2/2018

Enclosure: First Six-Month Status Report Regarding Requirement for Reliable Hardened Containment Vents (EA-13-109)

- cc: Southern Nuclear Operating Company
Mr. S. E. Kuczynski, Chairman, President & CEO
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer
Mr. D. R. Vineyard, Vice President – Hatch
Mr. B. L. Ivey, Vice President – Regulatory Affairs
Mr. M. D. Meier, Vice President – Regulatory Affairs
Mr. B. J. Adams, Vice President - Engineering
Mr. D. R. Madison, Vice President – Fleet Operations
RType: CHA02.004

U. S. Nuclear Regulatory Commission
Mr. W. M. Dean, Director of the Office of Nuclear Reactor Regulations
Mr. V. M. McCree, Regional Administrator
Mr. R. E. Martin, NRR Senior Project Manager – Hatch
Mr. D. H. Hardage, Senior Resident Inspector – Hatch
Ms. J. A. Kratchman, NRR/JLD/PMB
Mr. E. E. Bowman, NRR/DPR/PGCB

State of Georgia
Mr. J. H. Turner, Environmental Director Protection Division

**Edwin I. Hatch Nuclear Plant – Units 1 and 2
First Six-Month Status Report of the Implementation of the
Commission Order with Regard to Requirements for
Reliable Hardened Containment Vents (EA-13-109)**

Enclosure

**First Six-Month Status Report Regarding Requirement for
Reliable Hardened Containment Vents (EA-13-109)**

Enclosure

**Edwin I. Hatch Nuclear Plant – Units 1 and 2
 First Six Month Status Report for the Implementation of Order EA-13-109**

1 Introduction

Southern Nuclear Operating Company developed an Overall Integrated Plan (Reference 1) for the Edwin I. Hatch Nuclear Plant – Units 1 and 2 (HNP) documenting the installation of a Hardened Containment Vent System (HCVS) that provides a reliable hardened venting capability for pre-core damage and under severe accident conditions, including those involving a breach of the reactor vessel by molten core debris, in response to Reference 2. This enclosure provides an update of milestone accomplishments since submittal of the Phase 1 Overall Integrated Plan (OIP).

2 Milestone Accomplishments

In addition to the submittal of status reports, the following milestone(s) directly related to the vent Order implementation have been completed since the submittal of the OIP, and are current as of October 31, 2014:

- 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 dates do not impact the order implementation date.

| Milestone | Target Completion Date | Activity Status | Revised Target/ Completion Date |
|---|-------------------------------|------------------------|--|
| Submit Overall Integrated Implementation Plan | Jun 2014 | Complete | N/A |
| Submit 6 Month Status Report | Dec 2014 | Complete | N/A |
| Hold preliminary/conceptual design meeting | Mar 2015 | On Schedule | N/A |
| Submit 6 Month Status Report | Jun 2015 | On Schedule | N/A |
| Submit 6 Month Status Report | Dec 2015 | On Schedule | N/A |
| U2 Design Engineering On-site/Complete | Mar 2016 | On Schedule | N/A |
| Submit 6 Month Status Report | Jun 2016 | On Schedule | N/A |

Enclosure - NL-14-1839
 First Six-Month Status Report of Vent Order Implementation

| Milestone | Target Completion Date | Activity Status | Revised Target/ Completion Date |
|---|------------------------|-----------------|---------------------------------|
| Operations Procedure Changes Developed | Dec 2016 | On Schedule | N/A |
| Site Specific Maintenance Procedure Developed | Dec 2016 | On Schedule | N/A |
| Submit 6 Month Status Report | Dec 2016 | On Schedule | N/A |
| Training Complete | Dec 2016 | On Schedule | N/A |
| U2 Implementation Outage | Feb 2017 | On Schedule | N/A |
| Procedure Changes Active | Mar 2017 | On Schedule | N/A |
| U2 Walk Through Demonstration/Functional Test | Mar 2017 | On Schedule | N/A |
| U1 Design Engineering On-site/Complete | Mar 2017 | On Schedule | N/A |
| Submit 6 Month Status Report | Jun 2017 | On Schedule | N/A |
| Submit 6 Month Status Report | Dec 2017 | On Schedule | N/A |
| U1 Implementation Outage | Feb 2018 | On Schedule | N/A |
| U1 Walk Through Demonstration/Functional Test | Mar 2018 | On Schedule | N/A |
| Submit Completion Report | May 2018 | On Schedule | N/A |

4 Changes to Compliance Method

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

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

Edwin I. Hatch Nuclear Plant – Units 1 and 2, expect to comply with the order implementation date and no relief/relaxation is required at this time.

6 Open Items from Overall Integrated Plan and Interim Staff Evaluation

The following tables provide a summary of the open items documented in the Phase 1 Overall Integrated Plan or the Interim Staff Evaluation (ISE) and the status of each item.

| | Overall Integrated Plan Phase 1 Open Item | Status/Comment |
|----|---|--|
| 1 | Determine location of Dedicated HCVS Battery transfer switch | <i>In progress</i> |
| 2 | Determine location of back-up nitrogen bottles | <i>In progress</i> |
| 3 | Evaluate location of Portable DG for accessibility under Severe Accident HCVS use | Confirmatory action <i>In progress</i> |
| 4 | Confirm suppression pool heat capacity | Confirmatory action <i>In progress</i> |
| 5 | Determine location of HCVS Remote Operating Station (ROS) | <i>In progress</i> |
| 6 | State which approach or combination of approaches Plant Hatch decides to take to address the control of flammable gases, clearly demarcating the segments of vent system to which an approach applies | <i>In progress</i> |
| 7 | Evaluate SGTS Valve Leakage utilizing criteria from NEI HCVS-FAQ-05 | Confirmatory action <i>In progress</i> |
| 8 | Identify qualification method used for HCVS instruments | <i>In progress</i> |
| 9 | Evaluate HCVS monitoring location for accessibility, habitability, staffing sufficiency, and communication capability with Vent-use decision makers | Confirmatory action <i>In progress</i> |
| 10 | Perform severe accident evaluation for FLEX DG use post 24 hour actions | Confirmatory action <i>In progress</i> |
| 11 | Determine the control document for HCVS out of service time criteria | Confirmatory action <i>In progress</i> |

| Interim Staff Evaluation Open Item | Status |
|---|---------------|
| None to date | N/A |

7 Interim Staff Evaluation Impacts

There are no potential impacts to the Interim Staff Evaluation identified at this time.

8 References

The following references support the updates to the Phase 1 Overall Integrated Plan described in this enclosure:

1. SNC Letter, *Edwin I. Hatch Phase I Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Requirements for Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)*, dated June 27, 2014.
2. NRC Order Number EA-13-109, *Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions*, dated June 6, 2013.
3. NEI 13-02, *Industry Guidance for Compliance with NRC Order EA-13-109, To Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions, Revision 0*, dated November 2013.
4. NRC Interim Staff Guidance JLD-ISG-2013-02, *Compliance with Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions, Revision 0*, dated November 2013 (Accession No. ML13304B836).
5. NRC Endorsement, *Hardened Containment Venting System (HCVS) Phase 1 Overall Integrated Plan Template (EA-13-109) Rev 0* (Accession No. ML14128A219).