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

**Edwin I. Hatch Nuclear Plant**  
**Deferral of HNP-2 RPV Material Capsule Surveillance**

Ladies and Gentlemen:

The purpose of this letter is to inform the Nuclear Regulatory Commission (NRC) of a change in Southern Nuclear Operating Company's (SNC's) current removal schedule for the Plant Hatch Unit 2 (HNP-2) reactor pressure vessel (RPV) surveillance capsule. Per the schedule provided in the HNP-2 Final Safety Analysis Report (FSAR), the second surveillance capsule will be removed at an exposure of 15 effective full power years (EFPYs). The schedule requires removing the capsule during the Spring 2000 refueling outage. However, SNC is planning to defer withdrawal of the capsule for one cycle based upon the following discussion:

The Boiling Water Reactor Vessel and Internals Project (BWRVIP) is currently developing an integrated surveillance program (ISP) soon to be submitted to the NRC for review. The purpose of the ISP is to monitor radiation embrittlement of the U.S. BWR fleet RPVs. At present, each U.S. BWR has a surveillance program for monitoring the changes in RPV material properties due to neutron irradiation. The ISP will change the schedule for many BWRs in the fleet, and possibly HNP-2. As a result, it is prudent to defer removal of the capsule until the NRC reviews the ISP and the removal schedule is finalized.

As verified by General Electric (GE), the HNP-2 first surveillance capsule measured-shift results were within the Regulatory Guide 1.99, Revision 2, predicted shift range. Thus, the second capsule measured-shift results are expected to be within the predicted range. Also, the difference between the expected measured shift in a 15-EFPY withdrawal and the deferred withdrawal is small and will not affect the operating capability of the plant.

It is noteworthy that the current HNP-2 surveillance capsule removal schedule provided in the FSAR does not reflect an exemption from 10 CFR 50 Appendix H (6, 15, and 32 EFPYs) originally granted by the NRC and reflected in the original HNP-2 Technical Specifications (TS). The original HNP-2 removal schedule provided for removal at 10 and 30 calendar years. In July 1991, Georgia Power Company submitted to the NRC, and was granted in TS Amendment No. 118, a request allowing the relocation of the surveillance capsule removal schedule from the TS to the FSAR. However, when the removal schedule was relocated from the TS to the FSAR, the old Appendix H schedule was placed into the FSAR with no consideration of the earlier Appendix H exemption. In SNC's August 1997 HNP-2 Extended Power Uprate submittal, the FSAR schedule was referenced as the legitimate schedule, and plans to remove the HNP-2 surveillance capsule in the Spring of 2000 were indicated.

Approved

U. S. Nuclear Regulatory Commission  
Page Two  
January 4, 2000

As stated previously, SNC intends to defer the HNP-2 surveillance capsule withdrawal for one cycle. If the resulting ISP schedule calls for the capsule removal beyond an additional cycle, an evaluation will be performed to ensure the additional deferral, with respect to reactor safety, is acceptable.

Should you have any questions in this regard, please contact this office.

Respectfully submitted,



H. L. Sumner, Jr.

OCV/cr

cc: Southern Nuclear Operating Company  
Mr. P. H. Wells, Nuclear Plant General Manager  
SNC Document Management (R-Type A02.001)

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