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SOUTHERN COMPANY
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June 24, 2002

Docket Nos. 50-321
50-366

HL-6246

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

Edwin I. Hatch Nuclear Plant
Application for Technical Specification Improvement to
Eliminate Requirements for Post Accident Sampling Systems
Using the Consolidated Line Item Improvement Process

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) is submitting a request for an amendment to the Technical Specifications (TS) for Plant Hatch Unit 1 and Unit 2.

The proposed amendment would revise Technical Specification 5.5.3, "Post Accident Sampling System (PASS)," to eliminate the requirements to have and maintain the PASS at Plant Hatch. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTS-413, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this Technical Specification improvement was announced in the *Federal Register* on March 20, 2002 as part of the consolidated line item improvement process (CLIIP).

Enclosure 1 provides the description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Enclosure 2 provides the existing TS pages marked-up to show the proposed change. Enclosure 3 provides revised clean Technical Specification pages. Attachment 4 provides a summary of the regulatory commitments made in this submittal.

SNC requests approval of the proposed License Amendment by October 15, 2002, with the amendment being implemented within 30 days.

In accordance with the requirements of 10 CFR 50.91, a copy of this letter and all applicable enclosures will be sent to the designated State official of the Environment Protection Division of the Georgia Department of Natural Resources.

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Mr. H. L. Sumner, Jr. states he is Vice President of Southern Nuclear Operating Company and 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,

Lewis Sumner

H. L. Sumner, Jr.

Sworn to and subscribed before me this 24th *day of* June *2002.*

Elaine E. Belton

Notary Public

Commission Expiration Date: 5-25-2003

TWM/eb

Enclosures:
1. Description and Assessment
2. Proposed Technical Specification Changes
3. Revised Technical Specification Pages
4. Regulatory Commitments

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

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. L. N. Olshan, Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II
Mr. L. A. Reyes, Regional Administrator
Mr. J. T. Munday, Senior Resident Inspector - Hatch

State of Georgia
Mr. L. C. Barrett, Commissioner - Department of Natural Resources

Enclosure 1

Edwin I. Hatch Nuclear Plant
Application for Technical Specification Improvement to
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Description and Assessment

1.0 DESCRIPTION

The proposed Licensing amendment revises the program requirements of Technical Specification (TS) (5.5.3), "Post Accident Sampling System (PASS)."

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-413. The availability of this Technical Specification improvement was announced in the *Federal Register* on March 20, 2002 as part of the consolidated line item improvement process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Southern Nuclear Operating Company (SNC) has reviewed the safety evaluation published on December 27, 2001 (66 FR 66949) as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the information provided to support TSTF-413 (i.e., NEDO-32991-A, Rev. 0, "Regulatory Relaxation for BWR Post-Accident Sampling Stations," submitted November 30, 2000, and the associated NRC safety evaluation dated June 12, 2001). SNC has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Plant Hatch Unit 1 and Unit 2 and justify the incorporation of the changes to the Plant Hatch Technical Specifications.

2.2 Optional Changes and Variations

SNC is not proposing any significant variations or deviations from the Technical Specification changes described in TSTF-413 or the NRC staff's model safety evaluation published on December 27, 2001. Items 3 and 4 below describe slight variations that are necessary due to the nature of the existing specifications.

(1) Requirements for installing and maintaining PASS were included in a confirmatory order for Plant Hatch Unit 1 and Unit 2 issued on July 10, 1981. This amendment request includes superseding the requirements imposed by that confirmatory order.

(2) As described in the model safety evaluation published on December 27, 2001, the elimination of the TS and other regulatory requirements for PASS may result in additional changes to the TS. However, no additional Technical Specification changes were identified beyond those included in this submittal.

(3) The Plant Hatch Unit 1 and Unit 2 TS include an administrative requirement for a program to minimize the leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. However, PASS is not specifically listed in TS 5.5.2 as falling under the scope of this requirement.

(4) The elimination of PASS does not result in changes to the discussion in the Bases section for TS 3.3.3, "Post Accident Monitoring Instrumentation". The current Bases for TS 3.3.3 do not mention the capabilities of PASS.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Determination

Southern Nuclear has reviewed the proposed significant hazards consideration determination published on December 27, 2001 as part of the CLIIP. SNC has concluded that the proposed determination presented in the notice is applicable to Plant Hatch Unit 1 and Unit 2 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

(1) SNC has developed contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant and containment atmosphere. The contingency plans will be contained in chemistry procedures and implemented with the implementation of the License amendment. Establishment of contingency plans is considered a regulatory commitment.

(2) The capability for classifying fuel damage events at the Alert level threshold has been established for Plant Hatch Unit 1 and Unit 2 at radioactivity levels of 300 μCi/cc dose equivalent iodine. This capability will be described in emergency plan implementing procedures and implemented with the License amendment. The capability for classifying fuel damage events is considered a regulatory commitment.

(3) SNC has established the capability to monitor radioactive iodines that have been released to offsite environs. The capability is described in our emergency plan implementing procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.

4.0 ENVIRONMENTAL EVALUATION

SNC has reviewed the environmental evaluation included in the model safety evaluation published on December 27, 2001 as part of the CLIIP. SNC has concluded that the staff's findings presented in that evaluation are applicable to Plant Hatch Unit 1 and Unit 2 and the evaluation is hereby incorporated by reference for this application.

Enclosure 2

Edwin I. Hatch Nuclear Plant
Application for Technical Specification Improvement to
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Proposed Technical Specification Changes (Mark-Up)

5.5 Programs and Manuals (continued)

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, and Reactor Water Cleanup. The program shall include the following:

a. Preventive maintenance and periodic visual inspection requirements; and

b. System leak test requirements for each system, to the extent permitted by system design and radiological conditions, at refueling cycle intervals or less.

5.5.3 Post Accident Sampling INSERT 1

This program provides controls that ensure the capability to obtain and analyze reactor coolant; radioactive gases and particulates in plant gaseous effluents; and containment atmosphere samples under accident conditions. The program shall include the following:

a. Training of personnel;

b. Procedures for sampling and analysis; and

c. Provisions for maintenance of sampling and analysis equipment.

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation, including surveillance tests and setpoint determination, in accordance with the methodology in the ODCM;

b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to 10 times the concentrations stated in 10 CFR 20, Appendix B (to paragraphs 20.1001 - 20.2401), Table 2, Column 2;

(continued)

INSERT 1

NOTE

This program may be eliminated based on the implementation of NEDO-32991, Revision 0, Regulatory Relaxation for BWR Post Accident Sampling Stations (PASS)," and the associated NRC Safety Evaluation dated June 12, 2001.

5.5 Programs and Manuals (continued)

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, and Reactor Water Cleanup. The program shall include the following:

a. Preventive maintenance and periodic visual inspection requirements; and

b. System leak test requirements for each system, to the extent permitted by system design and radiological conditions, at refueling cycle intervals or less.

5.5.3 Post Accident Sampling (INSERT 1)

This program provides controls that ensure the capability to obtain and analyze reactor coolant; radioactive gases and particulates in plant gaseous effluents; and containment atmosphere samples under accident conditions. The program shall include the following:

a. Training of personnel;

b. Procedures for sampling and analysis; and

c. Provisions for maintenance of sampling and analysis equipment.

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation, including surveillance tests and setpoint determination, in accordance with the methodology in the ODCM;

b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to 10 times the concentrations stated in 10 CFR 20, Appendix B (to paragraphs 20.1001 - 20.2401), Table 2, Column 2;

(continued)

INSERT 1

NOTE

This program may be eliminated based on the implementation of NEDO-32991, Revision 0, Regulatory Relaxation for BWR Post Accident Sampling Stations (PASS)," and the associated NRC Safety Evaluation dated June 12, 2001.

Enclosure 3

Edwin I. Hatch Nuclear Plant
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Proposed Technical Specification Pages

Page Change Instructions

Unit 1

Page	Replace
5.0-8	5.0-8
5.0-9	5.0-9
5.0-10	5.0-10
5.0-11	5.0-11

Unit 2

Page	Replace
5.0-8	5.0-8
5.0-9	5.0-9
5.0-10	5.0-10
5.0-11	5.0-11

5.5 Programs and Manuals (continued)

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, and Reactor Water Cleanup. The program shall include the following:

a. Preventive maintenance and periodic visual inspection requirements; and

b. System leak test requirements for each system, to the extent permitted by system design and radiological conditions, at refueling cycle intervals or less.

5.5.3 Post Accident Sampling

----------NOTE----------
This program may be eliminated based on the implementation of NEDO-32991, Revision 0, Regulatory Relaxation for BWR Post Accident Sampling Stations (PASS)," and the associated NRC Safety Evaluation dated June 12, 2001.

This program provides controls that ensure the capability to obtain and analyze reactor coolant; radioactive gases and particulates in plant gaseous effluents; and containment atmosphere samples under accident conditions. The program shall include the following:

a. Training of personnel;

b. Procedures for sampling and analysis; and

c. Provisions for maintenance of sampling and analysis equipment.

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation, including surveillance tests and setpoint determination, in accordance with the methodology in the ODCM;

(continued)

5.5 Programs and Manuals

5.5.4 Radioactive Effluent Controls Program (continued)

b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to 10 times the concentrations stated in 10 CFR 20, Appendix B (to paragraphs 20.1001 - 20.2401), Table 2, Column 2;

c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;

d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to 10 CFR 50, Appendix I;

e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year, in accordance with the methodology and parameters in the ODCM, at least every 31 days;

f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;

g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the site boundary as follows:

1) For noble gases, less than or equal to a dose rate of 500 mrem/year to the total body and less than or equal to a dose rate of 3000 mrem/year to the skin, and

2) For iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days, less than or equal to a dose rate of 1500 mrem/year to any organ;

h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;

i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and

(continued)

5.5 Programs and Manuals

5.5.4 Radioactive Effluent Controls Program (continued)

j. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

5.5.5 Component Cyclic or Transient Limit

This program provides controls to track FSAR Section 4.2, cyclic and transient occurrences, to ensure that reactor coolant pressure boundary components are maintained within the design limits.

5.5.6 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components including applicable supports.

a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda are as follows:

ASME Boiler and Pressure Vessel Code and Applicable Addenda Terminology for Inservice Testing Activities	Required Frequencies for Performing Inservice Testing Activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Yearly or annually	At least once per 366 days

b. The provisions of SR 3.0.2 are applicable to the frequencies for performing inservice testing activities;

c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and

d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

5.5.7 Ventilation Filter Testing Program (VFTP)

The VFTP will establish the required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in Regulatory Guide 1.52, Revision 2, Sections C.5.c and C.5.d and at least once per 18 months, or:

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, 2) following painting, fire or chemical release in any ventilation zone communicating with the system, or 3) after every 720 hours of charcoal adsorber operation.

----------NOTES----------

1. Tests and evaluations have determined the impact on the Standby Gas Treatment (SGT) System filters of certain types of painting, buffing and grinding, and welding. The use of water based paints and the performance of metal grinding, buffing, or welding are not detrimental to the charcoal filters of the SGT System, either prior to or during operation. These activities will not require surveillance of the system upon their conclusion. This applies to all types of welding conducted at Plant Hatch, and tracking of the quantity of weld material used is not necessary.

2. For testing purposes, the use of refrigerants equivalent to those specified in ASME N510-1989 is acceptable.

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a. Demonstrate for each of the ESF systems that an inplace test of the HEPA filters shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, Section C.5.c, and ASME N510-1989, Section 10, at the system flowrate specified below.

ESF Ventilation System	Flowrate (cfm)
SGT System	3000 to 4000
Main Control Room Environmental Control (MCREC) System	2250 to 2750

b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, Section C.5.d, and ASME N510-1989, Section 11, at the system flowrate specified below.

ESF Ventilation System	Flowrate (cfm)
SGT System	3000 to 4000
MCREC System	2250 to 2750

(continued)

5.5 Programs and Manuals (continued)

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, and Reactor Water Cleanup. The program shall include the following:

a. Preventive maintenance and periodic visual inspection requirements; and

b. System leak test requirements for each system, to the extent permitted by system design and radiological conditions, at refueling cycle intervals or less.

5.5.3 Post Accident Sampling

----------NOTE----------
This program may be eliminated based on the implementation of NEDO-32991, Revision 0, Regulatory Relaxation for BWR Post Accident Sampling Stations (PASS), and the associated NRC Safety Evaluation dated June 12, 2001.

This program provides controls that ensure the capability to obtain and analyze reactor coolant; radioactive gases and particulates in plant gaseous effluents; and containment atmosphere samples under accident conditions. The program shall include the following:

a. Training of personnel;

b. Procedures for sampling and analysis; and

c. Provisions for maintenance of sampling and analysis equipment.

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation, including surveillance tests and setpoint determination, in accordance with the methodology in the ODCM;

(continued)

5.5 Programs and Manuals

5.5.4 Radioactive Effluent Controls Program (continued)

b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to 10 times the concentrations stated in 10 CFR 20, Appendix B (to paragraphs 20.1001 - 20.2401), Table 2, Column 2;

c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;

d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to 10 CFR 50, Appendix I;

e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year, in accordance with the methodology and parameters in the ODCM, at least every 31 days;

f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;

g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the site boundary as follows:

1) For noble gases, less than or equal to a dose rate of 500 mrem/year to the total body and less than or equal to a dose rate of 3000 mrem/year to the skin, and

2) For iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days, less than or equal to a dose rate of 1500 mrem/year to any organ;

h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;

i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and

(continued)

5.5 Programs and Manuals

5.5.4 Radioactive Effluent Controls Program (continued)

j. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

5.5.5 Component Cyclic or Transient Limit

This program provides controls to track FSAR Section 5.2, cyclic and transient occurrences, to ensure that reactor coolant pressure boundary components are maintained within the design limits.

5.5.6 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components including applicable supports.

a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda are as follows:

ASME Boiler and Pressure Vessel Code and Applicable Addenda Terminology for Inservice Testing Activities	Required Frequencies for Performing Inservice Testing Activities
Weekly	At least once per 7 days
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Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Yearly or annually	At least once per 366 days

b. The provisions of SR 3.0.2 are applicable to the frequencies for performing inservice testing activities;

c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and

d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

5.5.7 Ventilation Filter Testing Program (VFTP)

The VFTP will establish the required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in Regulatory Guide 1.52, Revision 2, Sections C.5.c and C.5.d and at least once per 18 months, or:

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, 2) following painting, fire or chemical release in any ventilation zone communicating with the system, or 3) after every 720 hours of charcoal adsorber operation.

----------NOTES----------

1. Tests and evaluations have determined the impact on the Standby Gas Treatment (SGT) System filters of certain types of painting, buffing and grinding, and welding. The use of water based paints and the performance of metal grinding, buffing, or welding are not detrimental to the charcoal filters of the SGT System, either prior to or during operation. These activities will not require surveillance of the system upon their conclusion. This applies to all types of welding conducted at Plant Hatch, and tracking of the quantity of weld material used is not necessary.

2. For testing purposes, the use of refrigerants equivalent to those specified in ASME N510-1989 is acceptable.

---

a. Demonstrate for each of the ESF systems that an inplace test of the HEPA filters shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, Section C.5.c, and ASME N510-1989, Section 10, at the system flowrate specified below.

ESF Ventilation System	Flowrate (cfm)
SGT System	3000 to 4000
Main Control Room Environmental Control (MCREC) System	2250 to 2750

b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, Section C.5.d, and ASME N510-1989, Section 11, at the system flowrate specified below.

ESF Ventilation System	Flowrate (cfm)
SGT System	3000 to 4000
MCREC System	2250 to 2750

(continued)

Enclosure 4

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Application for Technical Specification Improvement to
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Using the Consolidated Line Item Improvement Process

List of Regulatory Commitments

The following table identifies those actions committed by Southern Nuclear Operating Company (SNC) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to SNC corporate licensing.

Regulatory Commitments	**Due Date/Event**
SNC has developed contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, suppression pool, and containment atmosphere. The contingency plans will be contained in chemistry procedures and implemented with the implementation of the License amendment. Establishment of contingency plans is considered a regulatory commitment.	Implement with amendment
The capability of classifying fuel damage events at the Alert level threshold has been established for Plant Hatch Unit 1 and Unit 2 at radioactivity levels of 300 μCi/cc dose equivalent iodine. This capability will be described in emergency implementing procedures and implemented with the License amendment. The capability for classifying fuel damage events is considered a regulatory commitment.	Implement with amendment
SNC has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability is described in our emergency plan implementing procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.	Complete