

September 26, 2002

Mr. H. L. Sumner, Jr.  
Vice President - Nuclear  
Hatch Project  
Southern Nuclear Operating  
Company, Inc.  
Post Office Box 1295  
Birmingham, Alabama 35201-1295

SUBJECT: EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2 RE: ISSUANCE OF  
AMENDMENTS (TAC NOS. MB2966 AND MB2968)

Dear Mr. Sumner:

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 234 to Renewed Facility Operating License DPR-57 and Amendment No. 176 to Renewed Facility Operating License NPF-5 for the Edwin I. Hatch Nuclear Plant, Units 1 and 2. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated September 20, 2001, as supplemented by letters dated January 24, April 25, July 3, and July 16, 2002.

The amendments revise the TS to support extension of certain surveillance requirements from "92 days" to "92 days on an alternate test basis."

A copy of the related Safety Evaluation is also enclosed. A Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

*/RA/*

Joseph Colaccino, Project Manager, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-321 and 50-366

Enclosures:

1. Amendment No. 234 to DPR-57
2. Amendment No. 176 to NPF-5
3. Safety Evaluation

cc w/encls: See next page

September 26, 2002

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\*\*see previous concurrence

Package: ML022770262

Accession Number: ML022700096

TS Pages: ML022700231 & ML02700231

OFFICE	PDII-1/PM	PDII-1/LA	OGC	EEIB/SC	PDII-1/SC
NAME	JColaccino	EDunnington for: CHawes	RWeisman**	EMarinos*	JNakoski
DATE	09/25/02	09/25/02	09/23/02	07/29/02	09/25/02

SOUTHERN NUCLEAR OPERATING COMPANY, INC.

GEORGIA POWER COMPANY

OGLETHORPE POWER CORPORATION

MUNICIPAL ELECTRIC AUTHORITY OF GEORGIA

CITY OF DALTON, GEORGIA

DOCKET NO. 50-321

EDWIN I. HATCH NUCLEAR PLANT, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 234  
Renewed License No. DPR-57

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment to the Edwin I. Hatch Nuclear Plant, Unit 1 (the facility) Renewed Facility Operating License No. DPR-57 filed by Southern Nuclear Operating Company, Inc. (the licensee), acting for itself, Georgia Power Company, Oglethorpe Power Corporation, Municipal Electric Authority of Georgia, and City of Dalton, Georgia (the owners), dated September 20, 2001, as supplemented by letters dated January 24, April 25, July 3, and July 16, 2002, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations as set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is hereby amended by page changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. DPR-57 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 234, are hereby incorporated in the license. Southern Nuclear shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

*/RA/*

John A. Nakoski, Chief, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment:  
Technical Specification  
Changes

Date of Issuance: September 26, 2002

ATTACHMENT TO LICENSE AMENDMENT NO. 234

RENEWED FACILITY OPERATING LICENSE NO. DPR-57

DOCKET NO. 50-321

Replace the following pages of the Appendix A Technical Specifications and associated Bases with the attached revised pages. The revised pages are identified by amendment numbers and contain marginal lines indicating the areas of change.

<u>Remove</u>	<u>Insert</u>
1.1-1	1.1-1
1.1-2	1.1-2
1.1-3	1.1-3
1.1-4	1.1-4
1.1-5	1.1-5
3.3-4	3.3-4
3.3-17	3.3-17
3.3-21	3.3-21
3.3-28	3.3-28
3.3-31	3.3-31
3.3-37	3.3-37
3.3-45	3.3-45
3.3-49	3.3-49
3.3-50	3.3-50
3.3-56	3.3-56
3.3-59	3.3-59
3.3-60	3.3-60
3.3-63	3.3-63
B3.3-27	B3.3-27
B3.3-28	B3.3-28
B3.3-29	B3.3-29
B3.3-30	B3.3-30
B3.3-31	B3.3-31
B3.3-32	B3.3-32
B3.3-49	B3.3-49
B3.3-52	B3.3-52
B3.3-57	B3.3-57
B3.3-58	B3.3-58
B3.3-81	B3.3-81
B3.3-83	B3.3-83
B3.3-90	B3.3-90
B3.3-91	B3.3-91
B3.3-123	B3.3-123
B3.3-124	B3.3-124
B3.3-133	B3.3-133
B3.3-134	B3.3-134

Remove

B3.3-159  
B3.3-160  
B3.3-168  
B3.3-169  
B3.3-170  
B3.3-177  
B3.3-178  
B3.3-184

Insert

B3.3-159  
B3.3-160  
B3.3-168  
B3.3-169  
B3.3-170  
B3.3-177  
B3.3-178  
B3.3-184

SOUTHERN NUCLEAR OPERATING COMPANY, INC.

GEORGIA POWER COMPANY

OGLETHORPE POWER CORPORATION

MUNICIPAL ELECTRIC AUTHORITY OF GEORGIA

CITY OF DALTON, GEORGIA

DOCKET NO. 50-366

EDWIN I. HATCH NUCLEAR PLANT, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 176  
Renewed License No. NPF-5

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment to the Edwin I. Hatch Nuclear Plant, Unit 2 (the facility) Renewed Facility Operating License No. NPF-5 filed by Southern Nuclear Operating Company, Inc. (the licensee), acting for itself, Georgia Power Company, Oglethorpe Power Corporation, Municipal Electric Authority of Georgia, and City of Dalton, Georgia (the owners), dated September 20, 2001, as supplemented by letters dated January 24, April 25, July 3, and July 16, 2002, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations as set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is hereby amended by page changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-5 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 176 are hereby incorporated in the license. Southern Nuclear shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

*/RA/*

John A. Nakoski, Chief, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment:  
Technical Specification  
Changes

Date of Issuance: September 26, 2002

ATTACHMENT TO LICENSE AMENDMENT NO. 176

RENEWED FACILITY OPERATING LICENSE NO. NPF-5

DOCKET NO. 50-366

Replace the following pages of the Appendix A Technical Specifications and associated Bases with the attached revised pages. The revised pages are identified by amendment numbers and contain marginal lines indicating the areas of change.

<u>Remove</u>	<u>Insert</u>
1.1-1	1.1-1
1.1-2	1.1-2
1.1-3	1.1-3
1.1-4	1.1-4
1.1-5	1.1-5
1.1-6	1.1-6
1.1-7	1.1-7
3.3-4	3.3-4
3.3-17	3.3-17
3.3-21	3.3-21
3.3-28	3.3-28
3.3-31	3.3-31
3.3-37	3.3-37
3.3-45	3.3-45
3.3-49	3.3-49
3.3-50	3.3-50
3.3-56	3.3-56
3.3-59	3.3-59
3.3-60	3.3-60
3.3-63	3.3-63
B3.3-27	B3.3-27
B3.3-28	B3.3-28
B3.3-29	B3.3-29
B3.3-30	B3.3-30
B3.3-31	B3.3-31
B3.3-32	B3.3-32
B3.3-49	B3.3-49
B3.3-52	B3.3-52
B3.3-57	B3.3-57
B3.3-58	B3.3-58
B3.3-81	B3.3-81
B3.3-83	B3.3-83
B3.3-90	B3.3-90
B3.3-91	B3.3-91
B3.3-123	B3.3-123
B3.3-124	B3.3-124
B3.3-133	B3.3-133

Remove

B3.3-134  
B3.3-159  
B3.3-160  
B3.3-161  
B3.3-168  
B3.3-169  
B3.3-170  
B3.3-177  
B3.3-178  
B3.3-184

Insert

B3.3-134  
B3.3-159  
B3.3-160  
B3.3-161  
B3.3-168  
B3.3-169  
B3.3-170  
B3.3-177  
B3.3-178  
B3.3-184

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 234 TO

RENEWED FACILITY OPERATING LICENSE DPR-57

AND AMENDMENT NO. 176 TO

RENEWED FACILITY OPERATING LICENSE NPF-5

SOUTHERN NUCLEAR OPERATING COMPANY, INC., ET AL.

EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-321 AND 50-366

1.0 INTRODUCTION

By letter dated September 20, 2001, as supplemented by letters dated January 24, April 25, July 3, and July 16, 2002, Southern Nuclear Operating Company, Inc. (Southern Nuclear, the licensee), et al., proposed license amendments to change the Technical Specifications (TS) for the Edwin I. Hatch Nuclear Plant (Hatch), Units 1 and 2. The supplemental letters dated January 24, April 25, July 3, and July 16, 2002, provided clarifying information that did not change the scope of the notice of the proposed action published in the *Federal Register* on November 28, 2001 (66 FR 59514), nor the initial proposed no significant hazards consideration determination. In its submittals, the licensee has proposed a revision to the Hatch, Units 1 and 2 TS to change the surveillance test frequency for the channel functional tests and channel calibrations listed below from "92 days" to "92 days on an alternate test basis." In addition, the licensee has proposed to add a definition for alternate test basis to TS 1.1, "Definitions." The licensee proposes to modify the following TS:

Technical Specification  
Surveillance Requirement

3.3.1.1.9  
3.3.2.1.2, 3.3.2.1.3  
3.3.2.2.1  
3.3.4.1.1  
3.3.4.2.2  
  
3.3.5.1.2, 3.3.5.1.3  
3.3.5.2.2, 3.3.5.2.3  
3.3.6.1.2, 3.3.6.1.3  
3.3.6.2.2, 3.3.6.2.3  
3.3.6.3.2, 3.3.6.3.3, 3.3.6.3.4

Instrumentation

Reactor Protection System  
Control Rod Block  
Feedwater and Main Turbine Trip High Water Level  
End of Cycle Recirculation Pump Trip  
Anticipated Transient Without Scram Recirculation  
Pump Trip  
Emergency Core Cooling System  
Reactor Core Isolation Cooling System  
Primary Containment Isolation  
Secondary Containment Isolation  
Low-Low Set

## 2.0 REGULATORY EVALUATION

Paragraph (c)(3) of 10 CFR 50.36, "Surveillance Requirements," defines surveillance requirements as requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met. Also, General Design Criterion 21 of 10 CFR Part 50, Appendix A, "Protection System Reliability and Testability," requires, in part, that the protection system shall be designed for high functional reliability and inservice testability such that no single failure results in loss of protection function and removal from service of any component or channel does not result in loss of the required minimum redundancy unless the acceptable reliability of operation of the protection system can be otherwise demonstrated.

The licensee evaluated the change in surveillance intervals of the channel functional tests and channel calibrations in the instrumentation listed above from the current frequency of "92 days" to "92 days on an alternate test basis." The licensee's evaluation was based on an analysis of instrument component drift performance with reference to Generic Letter (GL) 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," and not on a component reliability analysis as in previous channel functional test evaluations. However, the licensee did perform a sensitivity analysis using the Hatch plant-specific probabilistic risk assessment (PRA).

The staff used Regulatory Guide (RG) 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," and RG 1.177, "An Approach for Plant-Specific, Risk Informed Decisionmaking: Technical Specifications," as guidance in its evaluation of the licensee's amendment request. The staff's review was primarily focused on the licensee's PRA sensitivity analysis. The licensee's amendment request was based on a traditional engineering analysis instead of the guidance in RG 1.174 or RG 1.177.

## 3.0 TECHNICAL EVALUATION

### 3.1 Background

The primary purpose of surveillance testing is to assure that the components in a standby system (safety system) will be operable when needed. The risk contribution associated with the surveillance test interval is mainly due to the possibility that the component will fail between consecutive tests. Testing these components detects failures that may have occurred since the last surveillance, thus limiting the risk due to undetected failures. However, increasing the time between surveillance tests may also have some benefits. Increased surveillance intervals may reduce test-induced transients, test-caused failures, equipment wear, and reduce required resources for testing. The disadvantage is that the time that a component will be subject to failure (the fault exposure time) increases with an increased surveillance test interval.

Previous generic studies, including General Electric (GE) NEDC-30851P-A, "Technical Specification Improvement Analysis for BWR Reactor Protection System," evaluated the relaxation of surveillance intervals for boiling water reactor (BWR) reactor protection system (RPS) instrumentation, including analog transmitter trip units and channel functional test related instrumentation. The current 3-month surveillance interval for channel functional testing is

based on topical reports submitted by GE, of which NEDC-30851P-A is representative. These reports developed an approach using reliability analysis to identify improvements in testing intervals and allowable outage times (AOTs) for the RPS and related instrumentation. As part of the NEDC-30851P-A evaluation, sensitivity studies were performed on RPS trip system fault trees. GE found that for each initiating event, the RPS unavailability was relatively insensitive to the change in component failure rates. The impact on RPS failure frequency was also found to be negligible. However, the evaluation of common-cause failure sensitivity found that the scram contactors common-cause contribution to RPS unavailability was high. Originally, the scram contactors were tested weekly as part of the weekly average power range monitor (APRM) channel functional test. However, as part of the evaluation included in NEDC-30851P-A, it was determined that the weekly APRM channel functional test was not required as part of the weekly APRM adjustments. Based on these results, the manual scram functional test frequency was revised to weekly (to maintain scram contactor testing at a weekly interval) and the APRM weekly adjustments were not extended. The GE report concluded that the RPS failure frequency would change little from monthly channel functional testing to quarterly testing.

In the Safety Evaluation Reports (SERs) for NEDC-30851P-A, dated July 15, 1987, and January 24, 1988, the staff also concluded that uncertainties in component failure rates do not significantly affect RPS unavailability. The staff also concluded that the estimated increase in RPS unavailability due to the proposed TS changes would result in an insignificant net change in core damage frequency (CDF). Therefore, the staff found a quarterly functional test interval acceptable.

### 3.2 Evaluation of TS Change to Test Frequency

In enclosure 1 of its submittal of September 20, 2001, the licensee justified the requested change on the basis of historical plant performance and because the implementation of the AOT and surveillance test intervals (STI) was based on NEDC 30851P-A. The licensee further stated that based on the staff's suggestion during the meeting of May 15, 2001, and as documented by the meeting minutes dated May 30, 2001, the licensee performed a sensitivity study that conservatively assumed the failure rates of the instrumentation increased by a factor of two to account for the increased surveillance intervals. The results of the sensitivity analysis show that the increase in surveillance intervals causes an insignificant increase in CDF and essentially no change in large early release frequency (LERF). The licensee also evaluated the proposed TS changes in accordance with the guidance provided in GL 91-04.

The staff previously reviewed the licensee's methodology to meet the guidance of GL 91-04 during its review of the licensee's request for extension of calibration surveillance test intervals from 18 months to 24 months. The staff's safety evaluation for amendments 232 and 174 at Units 1 and 2 respectively on the licensee's methodology is documented in its letter dated July 12, 2002 (Accession # ML022040085). Because the staff has already approved this methodology for the licensee's analysis of the drift, plant maintenance, and test history for the instrumentation channels in the safety evaluation for amendments 232 and 174, there is no need to review it further in this context. Therefore, the staff has determined that the instrument channels will continue to have sufficient margin and will meet the performance requirements of the instrument.

The staff's review of the risk impact and potential risk implications of the licensee's TS amendment request is based on Regulatory Issue Summary 2001-02, "Guidance on Risk-Informed Decisionmaking in License Amendment Reviews," dated January 18, 2001. Regulatory Issue Summary 2001-02 provides guidance on whether a "special circumstance" exists that creates an undue risk to public health and safety even though regulatory requirements appear to be satisfied. The staff also utilized the risk-informed decisionmaking process in RG 1.174 and RG 1.177 in its review. RG 1.177 states that the risk associated with the proposed change may be acceptable if (1) the current regulations are met, (2) operation is consistent with the defense-in-depth philosophy, (3) sufficient safety margin is maintained, (4) only a small increase in core damage frequency results, and (5) the basis for the risk estimate is monitored using performance measurement strategies.

The licensee performed a sensitivity analysis using the Hatch plant-specific PRA. The licensee stated that the PRA models the RPS and emergency core cooling system instrumentation. The instrumentation included by the licensee is all part of the analog transmitter trip system. The licensee's sensitivity study was performed with the subject instrumentation failure rates increased by a factor of two, consistent with the proposed 6-month surveillance interval request. A factor of two is also a reasonable assumption based on previous instrument surveillance interval extensions (1-to-3 month and 24-month) that have not shown significant changes in failure rates or failure modes over an extended surveillance interval. The results of the licensee's sensitivity study indicated a very small change in CDF ( $5E-07/\text{yr}$ ) and essentially no change in LERF. The licensee noted that the resulting change in CDF was within the guidelines stated in RG 1.174.

The additional instrument calibration data collected by the licensee in support of the proposed license amendment was used to update instrument drift data, and therefore, the data did not generally reflect equipment failures that would influence the PRA analysis results. The licensee stated that the data collected for various instrument types indicated that actual instrument failures were very small in number and would have little impact on the instrumentation failure rate assumptions in the PRA. As a result, the Hatch PRA was not updated to include the additional data.

The staff's SER for the Hatch individual plant examination (IPE) found that the Hatch data consisted of combined generic and plant-specific data using Bayesian updating for both hardware and testing/maintenance unavailabilities. The licensee's common-cause failure analysis utilized the Multiple Greek Letter method to account for dependent failures. The staff found the data used to quantify common-cause failures was consistent with the data used in most IPEs and PRAs. The licensee stated that the BWR Owners Group performed a peer review of the Hatch PRA using the Nuclear Energy Institute draft "Probabilistic Risk Assessment Peer Review Guidance," dated June 2, 2000. The results of this review did not result in any plant PRA revisions that would impact the proposed amendment request. The licensee also stated that the Hatch PRA has been continually revised since its initial IPE submittal to reflect plant as-built configurations.

To evaluate the licensee's results, the staff performed a cross-comparison using the Brunswick NUREG-1150 PRA as a basis (with additional RPS modeling) and confirmed that the sensitivity results were similar to the licensee's. Incorporating the RPS results and increasing the component unavailability for the remaining channel functional test related instrumentation by a factor of two resulted in an insignificant increase in CDF. The staff review credited operator

action and staggered testing. In addition, the licensee confirmed in discussions with the staff that the manual scram surveillance interval (manual scram contactor testing) would remain weekly and was not part of the amendment request. The licensee also stated it would modify the proposed amendment to implement a staggered test interval for the proposed 6-month instrumentation functional test interval. By letter dated July 3, 2002, the existing TS surveillance frequencies, which were initially proposed by the licensee in its submittal dated September 20, 2001, to be performed semi-annually, were modified to state that they would be performed at an interval of "92 days on an alternate test basis."

In its July 3, 2002, submittal, the licensee revised SR 3.3.5.1.3 and SR 3.3.5.2.3 from a channel calibration test to a channel functional test. The licensee's rationale for this change was based on the fact that these instrument channels consist of mechanical instruments, and therefore, no calibration test is performed on these instruments. The staff stated during a conference call that the TS should reflect the required intent of the test for the instrument channel as reflected in the standard test specification so that in the future if these instruments are replaced, the TSs do not have to be revised. The staff also discussed the surveillance test interval extension for SR 3.3.7.1.3 that required channel calibration every 92 days. The channel functional test for these instrument channels is being performed on a monthly basis. Also, the maintenance history for these instruments has identified one failure. Based on this information, the staff stated during the conference call that it could not approve the surveillance test interval extension for these instruments. By letter dated July 16, 2002, the licensee revised the submittal to reflect the above-discussed changes.

The staff finds that the licensee's proposed changes do not reveal an unforeseen hazard or substantially greater potential for a known hazard to occur based on the minimal increase in RPS unavailability and the insignificant increase in CDF (i.e., the increase in risk is within the RG 1.174 acceptance guidelines). The staff notes that the estimated risk impacts are very small and should not significantly influence the overall results of the licensee's deterministic analysis. The staff did not identify "special circumstances" that, if reviewed on a risk-informed basis, would invalidate the assumption of adequate protection, warrant attaching additional conditions, or result in denial of the proposed license amendment.

### 3.3 Definition of Alternate Test Basis

In discussions with the licensee, the staff stated that the licensee's justification to extend the quarterly surveillance test intervals to 6 months did not adequately demonstrate that all the common-cause failure mechanisms had been properly addressed. In addition, since the licensee's PRA analysis was based only on sensitivity studies, and the licensee's submittal was not risk informed, the staff could not justify the STI extension based on the licensee's analysis. To address these issues, the licensee agreed to stagger the surveillance testing of the channels on a quarterly basis in such a way that all channels will be tested in a 6-month period. A common-cause failure mode will be detected more readily by testing some of the channels every quarter. The licensee's submittal of April 25, 2002, implied that for a 4-channel system all instrument channels will be tested within a 368-day period. The licensee subsequently proposed, in its submittal of July 3, 2002, to add a new definition for alternate test basis as follows:

An ALTERNATE TEST BASIS shall consist of the testing of systems, subsystems, channels, or other designated components during the interval specified by the Surveillance Frequency, so that all systems, subsystems, channels or other designated components are tested during two consecutive Surveillance Frequency intervals according to the partial testing formula that follows, where  $n$  is the total number of systems, subsystems, channels, or other designated components in the associated function. If the total number of systems, subsystems, channels, or other designated components is even, then  $n/2$  are tested during each interval specified by the Surveillance Frequency. If the total number of systems, subsystems, channels, or other designated components is odd, then either  $(n+1)/2$  or  $(n-1)/2$  are tested during the first test interval at the specified Surveillance Frequency. The systems, subsystems, channels, or other designated components not tested during the first interval are tested during the next interval.

The staff finds that the licensee's proposed definition will diagnose the common-cause failure mode in the instrument channel as in the current TS because some instrument channels will be tested during the 92-day period. Therefore, extending the instrument surveillance interval from quarterly to 92 days on an alternate test basis is acceptable.

#### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Georgia State official was notified of the proposed issuance of the amendments. The State official had no comments.

#### 5.0 ENVIRONMENTAL CONSIDERATION

The amendments change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (66 FR 59514). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

#### 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: H. Garg

Date: September 26, 2002

Edwin I. Hatch Nuclear Plant

cc:

Mr. Ernest L. Blake, Jr.  
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