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August 4, 2003

Docket Nos.: 50-321 50-348 50-424  
50-366 50-364 50-425

NL-03-1620

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

Edwin I. Hatch Nuclear Plant  
Joseph M. Farley Nuclear Plant  
Vogtle Electric Generating Plant  
Response to Generic Letter 2003-01  
Control Room Habitability

Ladies and Gentlemen:

On June 12, 2003, the NRC issued Generic Letter (GL) 2003-01, "Control Room Habitability," requesting the submittal of information that demonstrates that the control room at each plant complies with the respective plant's current design and licensing bases and applicable regulatory requirements, and that suitable design, maintenance, and testing control measures are in place to ensure continued compliance. This information is requested within 180 days of the date of GL 2003-01. Alternatively, if the 180-day completion date cannot be met, a response addressing a proposed alternative course of action, including a schedule and the basis for the acceptability of the proposed alternative course of action, should be submitted within 60 days of the date of GL 2003-01.

Southern Nuclear Operating Company (SNC) has followed the development of the subject GL 2003-01 and the control room habitability (CRH) issue with the NRC and the industry. SNC involvement has included ongoing participation in the Nuclear Energy Institute (NEI) Task Force on CRH that developed NEI 99-03, "CRH Guidance." Early in 2003, SNC formed a multidisciplinary team to enhance coordination of CRH related activities at Edwin I. Hatch Nuclear Plant (HNP), Joseph M. Farley Nuclear Plant (FNP), and Vogtle Electric Generating Plant (VEGP) and to develop SNC standard approaches where appropriate.

SNC has reviewed the subject GL 2003-01 information requests and determined that necessary activities to develop this information cannot be completed in 180 days for HNP, FNP, and VEGP. As a result, this letter provides a proposed alternative course of action.

The proposed alternative course of action is acceptable based on the following. SNC review of the HNP, FNP, and VEGP design and licensing bases has resulted in the identification of potential analysis, maintenance, and/or modification options to address the GL 2003-01

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information requests. However, SNC cannot determine the appropriate CRH resolution path for each plant until control room envelope integrity testing is completed at each plant. Based on this assessment, SNC is focusing current resources on the expeditious completion of control room envelope integrity testing.

Specifically, SNC intends to perform control room envelope integrity testing at HNP, FNP, and VEGP using the standard test method described in American Society for Testing and Materials (ASTM) standard E741, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution." This tracer gas testing is scheduled to be completed by June 30, 2004, for HNP and FNP and by March 31, 2004, for VEGP. Within 90 days after completion of the tracer gas testing for the respective plant, SNC will submit a schedule for the remaining activities determined to be necessary to provide the information requested by GL 2003-01. These SNC plant-specific schedules will include the date by which that plant's control room will comply with the respective plant's current design and licensing bases and applicable regulatory requirements, and the date by which suitable design, maintenance, and testing control measures will be in place to ensure continued compliance.

Finally, SNC will continue to closely monitor industry and NRC activities to resolve remaining issues associated with the control room habitability technical specification traveler TSTF-448. HNP, FNP, and VEGP technical specifications currently have  $\Delta P$  surveillance requirements to demonstrate control room envelope integrity. Included in the above referenced plant-specific schedules will be a schedule to revise these surveillance requirements consistent with the NRC approved version of TSTF-448, with due consideration to any plant-specific configuration considerations.

This letter contains no NRC commitments. If you have any questions, please advise.

Sincerely,



H. L. Sumner, Jr.

HLS/CLT/sdl

cc: Southern Nuclear Operating Company  
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Mr. J. B. Beasley, Jr., Vice President, Plant Farley  
Mr. J. T. Gasser, Vice President, Plant Vogtle  
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Document Services RTYPE: CFA04.054; CHA02.004; CVC7000; LC# 13824

U. S. Nuclear Regulatory Commission  
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