

H. L. Sumner, Jr.  
Vice President  
Hatch Project

Southern Nuclear  
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December 30, 2003

Docket Nos.: 50-321  
50-366



*Energy to Serve Your World<sup>SM</sup>*  
NL-03-2407

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

Edwin I. Hatch Nuclear Plant  
Technical Specifications Revision  
To a Unit Staff Position Title

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) hereby proposes a change to the Edwin I. Hatch Nuclear Plant Unit 1 and Unit 2 Technical Specifications, Appendix A to operating licenses DPR-57 and NPF-5, respectively.

This request proposes to revise Administrative Controls Section 5.1.5 to state that any Senior Reactor Operator (SRO) may be designated to be responsible for the control room command function. This change is needed to support SNC's ongoing initiatives to achieve fleet standardization to improve plant efficiencies. Accordingly, the proposed change is consistent with the unit staff designation for the control room command function described in SNC sister plants', Farley and Vogtle, Administrative Controls Technical Specifications. Removal of a specific title designation and use the more generic SRO designation for the control room command function will also reduce the regulatory burden of having to make future requests to revise Section 5.1.5 whenever a title change for this position is implemented.

Enclosure 1 provides a description and justification for the change. Enclosure 2 contains the 10 CFR 50.92 evaluation and the justification for the categorical exclusion from performing an environmental assessment. Enclosure 3 provides the marked-up Technical Specifications pages and Enclosure 4 provides the clean typed pages. There are no corresponding Bases pages associated with this Technical Specifications change.

SNC requests the NRC to review and approve this change no later than June 30, 2004.

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Mr. H. L. Sumner, Jr. states he is a Vice President of 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.

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

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

*H. L. Sumner*

H. L. Sumner, Jr.

Sworn to and subscribed before me this 30 day of December, 2003.

*Valerie A. O'Brien*

Notary Public

My commission expires: 4/28/07

HLS/TMM/sdl

- Enclosures:
1. Description of and Justification for Proposed Changes.
  2. 10 CFR 50.92 and Environmental Evaluation
  3. Marked-up Technical Specifications Pages
  4. Clean Typed Technical Specifications Pages

cc: Southern Nuclear Operating Company  
Mr. J. D. Woodard, Executive Vice President  
Mr. G. R. Frederick, General Manager – Plant Hatch  
Document Services RTYPE: CHA02.004

U. S. Nuclear Regulatory Commission  
Mr. L. A. Reyes, Regional Administrator  
Mr. S. D. Bloom, NRR Project Manager – Hatch  
Mr. D. S. Simpkins, Senior Resident Inspector – Hatch

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

## Enclosure 1

### Edwin I. Hatch Nuclear Plant Technical Specifications Revision To a Unit Staff Position Title

#### Description and Justifications for Change

##### Description

The Edwin I. Hatch Nuclear Plant (HNP) Unit 1 and Unit 2 Technical Specifications Administrative Controls Section 5.1.5 currently state that the shift superintendent shall be responsible for the control room command function. This license amendment request proposes to revise Administrative Controls Section 5.1.5 to specify, instead, that a Senior Reactor Operator (SRO) shall be responsible for the control room command function.

##### Justification

The proposed change to HNP Technical Specification Administrative Controls Section 5.1.5 is requested to support Southern Nuclear Operating Company's (SNC's) ongoing effort to improve plant efficiency and standardize its operating fleet which also includes the Joseph M. Farley Nuclear Plant (FNP) and the Vogtle Electric Generating Plant (VEGP). The FNP and VEGP Administrative Controls Technical Specifications currently use the SRO unit staff designation for the control room command function. Removal of a specific title designation of shift superintendent and use the more generic SRO designation for the control room command function will also reduce the regulatory burden of having to make future requests to revise Section 5.1.5 whenever a title change for this position is implemented.

An SRO is currently required to fulfill the qualification requirement for the shift superintendent position as discussed in HNP Final Safety Analysis Report (FSAR) Section 13.1.3.1.5. The educational requirement and power plant experience for this position as discussed in HNP FSAR Section 13.1.3.1.5 will remain unchanged. Additionally, plant staff qualification in accordance with the applicable requirements of ANSI N18.1-1971 as discussed in HNP FSAR Section 13.1.3 is not impacted by the proposed change. Lines of authority for plant operations are also unaffected by the proposed change.

Enclosure 2

Edwin I. Hatch Nuclear Plant  
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To a Unit Staff Position Title

No Significant Hazards Evaluation and Environmental Assessment

**Proposed Change**

The unit staff designation in Technical Specifications Administrative Controls Section 5.1.5 for the individual responsible for the control room command function is being changed from shift superintendent to Senior Reactor Operator (SRO).

**10 CFR 50.92 Evaluation**

10 CFR 50.92(c), the NRC provides the following standards to be used in determining the existence of a significant hazards consideration:

...a proposed amendment to an operating license for a facility licensed under §50.21(b) or §50.22 or for a testing facility involves no significant hazards consideration, if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

Southern Nuclear Operating Company (SNC) has reviewed the proposed license amendment and has concluded that the change does not involve a significant hazards based upon the following discussion:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed change to Technical Specifications Administrative Controls Section 5.1.5, involves the use of a more generic designation of SRO for the unit staff position responsible for the control room command function. Since the proposed change is administrative in nature, it does not involve any physical changes to any structures, systems, or components, nor will their performance requirements be altered. The proposed change also does not affect the operation, maintenance, or testing of the plant. Therefore, the response of the plant to previously analyzed accidents will not be affected. Consequently, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any previously evaluated?

As a result of the proposed change to the Technical Specifications, the qualification requirements for the unit staff position responsible for the control room command function will remain unchanged and the plant staff will continue to meet applicable regulatory requirements. Also, since no change is being made to the design, operation, maintenance, or testing of the plant, no new methods of operation or failure modes are introduced by the

## Enclosure 2

### Edwin I. Hatch Nuclear Plant Technical Specifications Revision To a Unit Staff Position Title

#### No Significant Hazards Evaluation and Environmental Assessment

proposed change. Therefore, the possibility of a new or different kind of accident from any previously evaluated is not created.

3. Does the proposed change involve a significant decrease in the margin of safety?

The proposed change to the Technical Specifications will have no adverse impact on the onsite organizational features necessary to assure safe operation of the plant since the qualification requirements for the unit staff position for the control room command function remain unchanged. The adoption of the more generic designation of SRO for the individual responsible for control room command function will also reduce the regulatory burden of having to devote limited resources to process a license amendment whenever a title change for this position is implemented, thus improving plant efficiency. Therefore, the proposed change does not involve a significant decrease in the margin of safety.

Based upon the preceding information, SNC has concluded that the requested change does not involve a significant hazards consideration.

#### Environmental Assessment

10 CFR 51.22(c)(9) provides criteria for identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed license amendment will not:

1. Involve a significant hazards consideration,
2. Result in a significant change in the types, or a significant increase in the amounts, of any effluents that may be released offsite, or
3. Result in a significant increase in individual or cumulative occupational radiation exposure.

SNC has evaluated the proposed changes and determined the changes do not involve (1) a significant hazards consideration, (2) a significant change in the types or significant increase in the amounts of any effluents that may be released off-site, or (3) a significant increase in the individual or cumulative occupational exposure. Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9), and an environmental assessment of the proposed change is not required.

Enclosure 3 .

Edwin I. Hatch Nuclear Plant  
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Marked-up Technical Specifications Pages

## 5.0 ADMINISTRATIVE CONTROLS

### 5.1 Responsibility

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- 5.1.1 The plant manager shall provide direct executive oversight over all aspects of Plant Hatch.
- 5.1.2 An assistant plant manager shall be responsible for overall unit operation, except for the Radiological Environmental Monitoring Program as described below and for delegation in writing of the succession of this responsibility during his absence. Certain plant support functions shall also be the responsibility of an assistant plant manager.
- 5.1.3 The plant manager or his designee shall be responsible for the Radiological Environmental Monitoring Program and for the writing of the Annual Radiological Environmental Operating Report.
- 5.1.4 Each of the individuals in Specification 5.1.1 through Specification 5.1.3 is responsible for the accuracy of the procedures needed to implement his responsibilities.
- 5.1.5 ~~The shift superintendent~~ shall be responsible for the control room command function. During any absence of the ~~shift superintendent~~ from the control room while either unit is in MODE 1, 2, or 3, an individual with an active ~~Senior Reactor Operator (SRO)~~ license shall be designated to assume the control room command function. During any absence of the ~~shift superintendent~~ from the control room while both units are in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

A Senior Reactor Operator (SRO) responsible SRO

responsible SRO

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5.1.3 The plant manager or his designee shall be responsible for the Radiological Environmental Monitoring Program and for the writing of the Annual Radiological Environmental Operating Report.

5.1.4 Each of the individuals in Specification 5.1.1 through Specification 5.1.3 is responsible for the accuracy of the procedures needed to implement his responsibilities.

5.1.5 <sup>A Senior Reactor Operator (SRO)</sup> ~~The shift superintendent~~ shall be responsible for the <sup>responsible SRO</sup> control room command function. During any absence of the ~~shift superintendent~~ from the control room while either unit is in MODE 1, 2, or 3, an individual with an active ~~Senior Reactor Operator (SRO)~~ license shall be designated to assume the control room command function. During any absence of the ~~shift superintendent~~ from the control room while both units are in MODE 4 or 5, <sup>responsible SRO</sup> an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

Enclosure 4

Edwin I. Hatch Nuclear Plant  
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Clean Typed Technical Specifications Pages

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- 5.1.3 The plant manager or his designee shall be responsible for the Radiological Environmental Monitoring Program and for the writing of the Annual Radiological Environmental Operating Report.
- 5.1.4 Each of the individuals in Specification 5.1.1 through Specification 5.1.3 is responsible for the accuracy of the procedures needed to implement his responsibilities.
- 5.1.5 A Senior Reactor Operator (SRO) shall be responsible for the control room command function. During any absence of the responsible SRO from the control room while either unit is in MODE 1, 2, or 3, an individual with an active SRO license shall be designated to assume the control room command function. During any absence of the responsible SRO from the control room while both units are in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.
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- 5.1.5 A Senior Reactor Operator (SRO) shall be responsible for the control room command function. During any absence of the responsible SRO from the control room while either unit is in MODE 1, 2, or 3, an individual with an active SRO license shall be designated to assume the control room command function. During any absence of the responsible SRO from the control room while both units are in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.
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