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February 20, 2004

Docket Nos.: 50-424  
50-425

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

Vogtle Electric Generating Plant  
Request to Revise Technical Specifications  
Administrative Controls

Ladies and Gentlemen:

In accordance with the requirements of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) proposes to revise Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications (TS). The proposed change would revise TS Administrative Controls 5.2.2.g. TS 5.2.2.g would be revised to limit the requirement of the Shift Technical Advisor (STA) function to Modes 1-4 in accordance with NUREG 0737.

Enclosure 1 provides the basis for the proposed change. Pursuant to 10 CFR 50.92, Enclosure 2 demonstrates that the proposed change does not involve a significant hazards consideration. Enclosure 3 contains a mark-up of the affected page from the current VEGP Technical Specifications. Enclosure 4 contains the typed version of the revised Technical Specifications page.

SNC requests approval of the proposed license amendment by March 2005, with the amendment being implemented within 60 days.

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

(Affirmation and signature are on the following page.)

A001

Mr. J. T. Gasser 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.

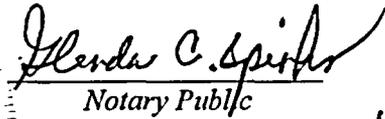
Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Jeffrey T. Gasser

Sworn to and subscribed before me this 20<sup>th</sup> day of February, 2004



Notary Public

My commission expires: 11/10/06

JTG/tdh

- Enclosures:
1. Basis for Proposed Change
  2. 10 CFR 50.92 Significant Hazards Evaluation
  3. Marked-Up Technical Specifications Page
  4. Typed Revised Technical Specifications Page

cc: Southern Nuclear Operating Company  
Mr. J. B. Beasley, Jr., Executive Vice President  
Mr. W. F. Kitchens, General Manager – Plant Vogtle  
Mr. M. Sheibani, Engineering Supervisor – Plant Vogtle  
Document Services RTYPE: CVC7000

U. S. Nuclear Regulatory Commission

Mr. L. A. Reyes, Regional Administrator  
Mr. S. D. Bloom, NRR Project Manager – Vogtle  
Mr. J. Zeiler, Senior Resident Inspector – Vogtle

State of Georgia

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

Enclosure 1

Vogle Electric Generating Plant  
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Basis for Proposed Change

## Enclosure 1

### Vogtle Electric Generating Plant Request to Revise Technical Specifications Administrative Controls

#### Bases for Proposed Change

#### Proposed Change

- Southern Nuclear Operating Company (SNC) proposes to revise the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications (TS). TS 5.2.2.g states: "An individual shall be assigned to each shift who provides technical support in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit." The following revision is proposed: "An individual shall be assigned who provides technical support in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall be available for duty when the plant is in Modes 1-4. At other times, this individual is not required."

#### Justification

The objective of the Shift Technical Advisor (STA) function is to improve the quality of plant technical management and operation by providing additional on-shift expertise in the area of operational safety, thus reducing the probability of abnormal or emergency condition occurrences and mitigating the consequences of these conditions if they do occur. The STA's function is to provide engineering and accident assessment expertise to the shift supervisor in the event of abnormal or accident conditions. Proper implementation of the STA requirement can provide significant assurance that engineering expertise is available and accident assessment is carried out for the immediate actions needed to be taken while an event is in progress.

On October 31, 1980, the NRC issued NUREG-0737, which incorporated into one document all Three Mile Island (TMI)-related items approved for implementation by the Commission at that time. Item I.A.1.1 of NUREG-0737 discussed the requirements for the Shift Technical Advisor. This section stated the following regarding the requirements for the STA function, in part: "Until these requirements for eliminating the STA position have been established, the staff continues to require that, in addition to the staffing requirements specified in its July 31, 1980 letter (as revised by Item I.A.1.3 of this enclosure), an STA be available for duty on each operating shift when a plant is being operated in Modes 1-4 for a PWR and Modes 1-3 for a BWR. At other times, an STA is not required to be on duty."

As indicated above, TS 5.2.2.g requires the STA function on each operating shift. With the clarification in Item I.A.1.1 of NUREG 0737, the STA function is only required in Modes 1-4 for a PWR. In addition, most transient accident analysis is limited to initiation in Modes 1-4. Of those not limited to Modes 1-4, the only significant ones are radiation waste and fuel handling accidents for which no operator actions are credited. Therefore, the STA function is not required in Modes 5 and 6. TS 5.2.2.g should be revised to require the STA function when the plant is in Modes 1-4.

Enclosure 2

Vogtle Electric Generating Plant  
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10 CFR 50.92 Significant Hazards Evaluation

## Enclosure 2

### Vogtle Electric Generating Plant Request to Revise Technical Specifications Administrative Controls

#### Significant Hazard Consideration Evaluation

##### Proposed Changes

- Southern Nuclear Operating Company (SNC) proposes to revise the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications (TS). TS 5.2.2.g states: "An individual shall be assigned to each shift who provides technical support in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit." The following revision is proposed: "An individual shall be assigned who provides technical support in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall be available for duty when the plant is in Modes 1-4. At other times, this individual is not required."

##### Evaluation

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

The proposed change to TS 5.2.2.g does not significantly increase the probability or consequences of an accident previously evaluated in the FSAR. This revision does not have any effect on the probability of any accident initiators. The consequences of accidents previously evaluated in the FSAR are not adversely affected by this proposed change because the STA is not credited for mitigation of any accidents. The proposed change which requires the STA function to be available while in Modes 1-4 is in accordance with the requirements of NUREG 0737, Item I.A.1.1. Consequently, the probability or consequences of an accident previously evaluated are not significantly increased.

Therefore, 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?

The proposed change to TS 5.2.2.g does not create the possibility of a new or different kind of accident from any previously evaluated. No new accident scenarios, failure mechanisms, or limiting single failures are introduced as a result of the proposed change. The proposed Technical Specifications change does not challenge the performance or integrity of any safety-related systems. The proposed change to TS 5.2.2.g is in accordance with NUREG 0737.

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

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

The proposed change to TS 5.2.2.g will not reduce a margin of safety because it has no direct effect on any safety analyses assumptions. The STA function is to evaluate plant conditions and provide advice to the shift supervisor during plant transients and accidents. The proposed change limits the requirement for the STA function to Modes 1-4 in accordance with NUREG 0737. The STA function is not credited for the mitigation of any accidents previously evaluated.

Therefore, the proposed change does not involve a significant reduction in any margin of safety.

## **Enclosure 2**

### **Vogtle Electric Generating Plant Request to Revise Technical Specifications Administrative Controls**

#### **Significant Hazard Consideration Evaluation**

##### **Conclusion**

Based on the preceding evaluation, Southern Nuclear has determined that the proposed change meets the requirements of 10 CFR 50.92(c) and does not involve a significant hazards consideration.

##### **Environmental Evaluation**

Southern Nuclear has evaluated the proposed changes and determined that the change does not involve (i) a significant hazards consideration (ii) a significant change in the types or significant increase in the individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.

Enclosure 3

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Marked-Up Technical Specifications Page

## 5.2 Organization

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### 5.2.2 Unit Staff (continued)

event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time;
2. An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time;
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time;
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the applicable department manager or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual excess overtime shall be reviewed monthly by the General Manager - Nuclear Plant or his designee to assure that excessive hours were authorized and that they do not become routine.

- f. The Operations Manager shall hold an SRO license.
- g. An individual shall be assigned to each shift who provides technical support in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall be available for duty when the plant is in modes 1-4. At other times, this individual is not required. In addition, this individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. This position may also be filled by the Shift Superintendent or

Enclosure 4

Vogtle Electric Generating Plant  
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Typed Revised Technical Specifications Page

5.2 Organization

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5.2.2 Unit Staff (continued)

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