

April 5, 2005

Mr. Jeffrey T. Gasser  
Executive Vice President  
Southern Nuclear Operating Company, Inc.  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201-1295

SUBJECT: JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2, EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2, AND VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2 — REQUEST FOR ADDITIONAL INFORMATION RE: PROPOSED CHANGE TO THE QUALITY ASSURANCE PROGRAM (TAC NOS. MC5666, MC5667, MC5668, MC5669, MC5670, AND MC5671)

Dear Mr. Gasser:

By letter dated December 23, 2004, Southern Nuclear Operating Company requested a revision to the Quality Assurance Program for the Joseph M. Farley Nuclear Plant, Edwin I. Hatch Nuclear Plant, and Vogtle Electric Generating Plant. The submittal proposed to make changes to the independent review program and the audit program. The Nuclear Regulatory Commission staff has completed its initial review and has determined that additional information is necessary to continue the review. This information is identified in the Enclosure.

We discussed these issues with Mr. Ben George of your staff on March 28, 2005. Your staff indicated that you would attempt to provide your response within 30 days of the date you receive the questions.

Please contact me at (301) 415-1842, if you have any other questions on these issues.

Sincerely,

*/RA/*

Sean E. Peters, Project Manager, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-348, 50-364, 50-321, 50-366  
50-424, and 50-425

Enclosure: Request for Additional Information

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION

SOUTHERN NUCLEAR OPERATING COMPANY, INC.

JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2

EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2

VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2

DOCKET NOS. 50-348, 50-364, 50-321, 50-366, 50-424, AND 50-425

The U. S. Nuclear Regulatory Commission (NRC) staff has reviewed the licensee's submittal dated December 23, 2004, regarding a proposed revision to the Quality Assurance (QA) Program. The NRC staff has identified the following information that is needed to enable the continuation of its review.

1. Audit Interval

Administrative Letter (AL) 95-06 establishes the basis for increasing audit intervals to a maximum of 24 months by implementation of a performance-based schedule (schedule adjusted according to objective evaluation of plant functional area performance). AL 95-06 cites exceptions to the allowable use of performance-based audit intervals as (1) those audit intervals defined by regulations, such as for emergency and security plans, and (2) triennial audits of fire protection plans, conducted by outside qualified fire consultants.

Change 3 of the submittal proposes to extend audit intervals to 24 months. However, the submittal does not address a performance-based schedule to support the change. A description of the performance-based scheduling process should be submitted, with a complementary commitment in the QA program description for each site.

2. Audit List

Change 2 proposes to substitute a standardized list of audits in place of audits currently identified in Section 17.2.18 of the QA program descriptions for Hatch and Vogtle and Table 17.2-2 for Farley Nuclear Plant. The submittal states that audit topics not specifically identified in the standardized list would be covered under the generic category of audits required to meet Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants."

It is not clear that the deleted audit topics fall under the scope of 10 CFR Part 50, Appendix B (e.g., balance-of-plant instrument calibration, radioactive material packages, fuel handling and special nuclear materials, etc.). For each deleted audit topic, identify the Appendix B criteria under which the topic would be covered. For deleted audit topics not falling under the scope of Appendix B, provide a basis for the deletion.

3. Audits Specified by Regulations or Implementing Program Plans

Regulations establish audit requirements for certain programs, such as the station security plan or emergency response plan. Change 3 of the submittal proposes changes in the audit intervals for the Security Plan, Radiological Environmental Monitoring Program, and the Environmental Protection Plan.

Confirm that audit requirements in the revised QA program descriptions are consistent with these plans and applicable state and federal regulations.

Joseph M. Farley Nuclear Plant  
Edwin I. Hatch Nuclear Plant  
Vogtle Electric Generating Plant

cc:

Mr. Jeffrey T. Gasser  
Executive Vice President  
Southern Nuclear Operating Company, Inc.  
P.O. Box 1295  
Birmingham, AL 35201

Mr. Raymond D. Baker  
Manager - Licensing  
Southern Nuclear Operating Company, Inc.  
P.O. Box 1295  
Birmingham, AL 35201

Mr. J. R. Johnson  
General Manager  
Southern Nuclear Operating Company, Inc.  
P.O. Box 470  
Ashford, AL 36312

Mr. H. L. Summer, Jr.  
Vice President - Nuclear Hatch Project  
Southern Nuclear Operating Company, Inc.  
P.O. Box 1295  
Birmingham, AL 35201-1295

Mr. L. M. Stinson  
Vice President - Farley Project  
Southern Nuclear Operating  
Company, Inc.  
P.O. Box 1295  
Birmingham, AL 35201-1295

Mr. M. Stanford Blanton  
Balch and Bingham Law Firm  
P.O. Box 306  
1710 Sixth Avenue North  
Birmingham, AL 35201

Mr. B. D. McKinney, Licensing Manager  
Southern Nuclear Operating Company, Inc.  
P.O. Box 1295  
Birmingham, AL 35201-1295

William D. Oldfield  
SAER Supervisor  
Southern Nuclear Operating Company, Inc.  
P.O. Box 470  
Ashford, AL 36312

Resident Inspector  
Hatch Project  
11030 Hatch Parkway North  
Baxley, GA 31513

Resident Inspector  
Farley Nuclear Plant  
U.S. Nuclear Regulatory Commission  
7388 N. State Highway 95  
Columbia, AL 36319

Laurence Bergen  
Oglethorpe Power Corporation  
2100 E. Exchange Place  
P.O. Box 1349  
Tucker, GA 30085-1349

Mr. Harold Reheis, Director  
Department of Natural Resources  
205 Butler St, SE, Suite 1252  
Atlanta, GA 30334

Chairman  
Appling County Commissioners  
County Commissioners  
Baxley, GA 31513

Office of the County Commissioners  
Burke County Commission  
Waynesboro, GA 30830

State Health Officer  
Alabama Department of Public Health  
434 Monroe St.  
Montgomery, AL 36130-1701

Chairman  
Houston County Commission  
P.O. Box 6406  
Dothan, AL 36302

Joseph M. Farley Nuclear Plant  
Edwin I. Hatch Nuclear Plant  
Vogtle Electric Generating Plant

cc:

Mr. Arthur H. Dombay, Esq.  
Troutman Sanders  
Nations Bank Plaza  
600 Peachtree St, NE  
Suite 5200  
Atlanta, GA 30308

Resident Inspector  
Vogtle Plant  
8805 River Road  
Waynesboro, GA 30830

Mr. Steven M. Jackson  
Senior Engineer -Power Supply  
Municipal Electric Authority of Georgia  
1470 Riveredge Parkway, NW  
Atlanta, GA 30303-4684

Mr. G. R. Frederick, General Manager  
Edwin I. Hatch Nuclear Plant  
Southern Nuclear Operating Company, Inc.  
U.S. Highway 1 North  
P.O. Box 2010  
Baxley, GA 31515

Mr. Reece McAllister  
Executive Secretary  
Georgia Public Service Commission  
244 Washington St., SW  
Atlanta, GA 30334

Mr. D. E. Grissette, Vice President  
Southern Nuclear Operating Company, Inc.  
P.O. Box 1295  
Birmingham, AL 35201

Mr. K. Rosanski, Resident Manager  
Oglethorpe Power Corporation  
Edwin I. Hatch Nuclear Plant  
P.O. Box 2010  
Baxley, GA 31515

Mr. N.J. Stringfellow, Manager-Licensing  
Southern Nuclear Operating Company, Inc.  
P.O. Box 1295  
Birmingham, AL 35201-1295

Mr. Skip Kitchens, General Manager  
Vogtle Electric General Plant  
Southern Nuclear Operating Company, Inc.  
P.O. Box 1600  
Waynesboro, GA 30830

Attorney General  
Law Department  
132 Judicial Building  
Atlanta, GA 30334