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May 31, 2005

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

NL-05-0946

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Edwin I. Hatch Nuclear Plant
Joseph M. Farley Nuclear Plant
Vogtle Electric Generating Plant
Response to NRC Guidance Regarding Mitigation Strategies

Ladies and Gentlemen:

The NRC issued Orders For Interim Safeguards and Security Compensatory Measures ("Order EA-02-026" or "ICM Order") dated February 25, 2002, for the Edwin I. Hatch Nuclear Plant (HNP), the Joseph M. Farley Nuclear Plant (FNP), and the Vogtle Electric Generating Plant (VEGP).

Order EA-02-026 imposed requirements on nuclear power plants licensed pursuant to the Atomic Energy Act of 1954 and Title 10 of the Code of Federal Regulations. Section III.A of the Order required licensees to implement certain changes in physical security and emergency planning on an interim basis until final requirements were established. Among other requirements, Southern Nuclear Operating Company (SNC) was required to complete implementation of the requirements of Section II.B.5.b. of Order EA-02-026 by August 31, 2002.

Subsequently, the NRC issued Orders dated April 29, 2003, Requiring Compliance with Revised Design Basis Threat for Operating Power Reactors ("Order EA-03-086" or "DBT Order") and other security related Orders (collectively "Orders") for HNP, FNP and VEGP. In many ways, Order EA-03-086 complemented or superseded the interim measures imposed by Order EA-02-026.

As required by Order EA-03-086, the Plans for the above-mentioned licensed facility have been implemented. Subsequently, SNC was requested to respond to the letter from J.E. Dyer, Director, Office of Nuclear Reactor Regulation, dated February 25, 2005, *NRC Staff Guidance for Use in Achieving Satisfactory Compliance with February 25, 2002, Order Section B.5.b*, ("NRC B.5.b.

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Guidance”) by May 31, 2005, and to implement appropriate enhancements to current mitigation strategies by August 31, 2005. Specifically, nuclear power plant licensees were requested by Enclosure 2 of the February 25, 2005 letter, *Developing Mitigating Strategies / Guidance for Nuclear Power Plants to Respond to Loss of Large Areas of the Plant in Accordance with B.5.b of the February 25, 2002, Order* (dated February 24, 2005) (“NRC B.5.b. Guidance”), to review the Areas of Consideration delineated in Attachment A to that Enclosure and evaluate additional considerations for potential inclusion in the licensees’ mitigating strategies that licensees deemed appropriate in accordance with the expectations in Attachment B to that Enclosure.

Subsequently, the Nuclear Energy Institute (“NEI”), in conjunction with the NEI Security Working Group, developed and issued guidance for licensee use (“NEI Guidance”) to assist licensees in responding to the February 25, 2005, letter.

As requested in the February 25, 2005, letter, SNC has reviewed the information in Attachments A and B in accordance with the NEI Guidance and is hereby submitting, as Safeguards Information enclosures to this letter, Enclosures 1, 2, and 3 (for HNP, FNP and VEGP, respectively), SNC’s evaluation of the information the NRC provided. These enclosures reflect the results of our review of the guidance and describe the considerations that SNC either has already implemented or intends to implement at HNP, FNP and VEGP by August 31, 2005 except for some fuel movements that may take until the end of September.

The primary guiding principles used in the conduct of this evaluation were (1) whether or not equipment and resources were “readily available,” and (2) if equipment is readily available, can it be effectively utilized in a licensee’s mitigating strategy. SNC considered “readily available” to mean that the equipment or resources were already licensee owned, under contract, or part of an existing Memorandum of Understanding. Further, even if equipment and resources are readily available, the second criterion is to ensure that the equipment can be used in a mitigating strategy in an effective manner. Even if the equipment is readily available, it is of no value if it cannot be effective in implementing the mitigating strategy.

In accordance with these principles, mitigative strategies are being implemented to address the NRC B.5.b. Guidance. These strategies are considered to be commitments for that purpose and will be managed in accordance with SNC’s commitment management system. These commitments are listed in the third column (identified as Column 3) of the tables included in Enclosures 1, 2 and 3 and will be reviewed every three years to ensure they are maintained within the guiding principles. Any other statements in the tables are provided for information purposes and are not considered to be regulatory commitments.

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Sincerely



Jeffrey T. Gasser

JTG/DWD/daj

- Enclosure 1: SNC Evaluation for Edwin I. Hatch Nuclear Plant of NRC B.5.b Guidance
(NOTE: Contains SGI)
- Enclosure 2: SNC Evaluation for Joseph M. Farley Nuclear Plant of NRC B.5.b Guidance
(NOTE: Contains SGI)
- Enclosure 3: SNC Evaluation for Vogtle Electric Generating Plant of NRC B.5.b Guidance
(NOTE: Contains SGI)

cc: Southern Nuclear Operating Company

Mr. L. M. Stinson, Vice President – Plant Farley	(letter only)
Mr. H. L. Sumner, Jr., Vice President – Plant Hatch	(letter only)
Mr. D. E. Grissette, Vice President – Plant Vogtle	(letter only)
Mr. J. R. Johnson, General Manager – Plant Farley	(letter only)
Mr. G. R. Frederick, General Manager – Plant Hatch	(letter only)
Mr. W. F. Kitchens, General Manager – Plant Vogtle	(letter only)
Ms. R. V. Badham, Plant Admin. Manager – Plant Farley	<i>(Contains SGI - Enclosure 2)</i>
Mr. J. R. Thompson, Security Manger – Plant Hatch	<i>(Contains SGI - Enclosure 1)</i>
Mr. K. C. Dyar, Security Manager – Plant Vogtle	<i>(Contains SGI - Enclosure 3)</i>
Mr. J. G. Sims, Project Coordinator, Nuclear Security	<i>(Contains SGI)</i>
Mr. D. P. Burford, Nuclear Fleet Security & E. P. Manager	(letter only)
SNC Document Services	<i>(Contains SGI)</i>
RType: CFA04.054; CHA02.004; CVC7000; LC# 14279	(letter only)

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Mr. J. E. Dyer, Director, Office of Nuclear Reactor Regulation	<i>(Contains SGI)</i>
Dr. W. D. Travers, Regional Administrator (2 copies)	<i>(Contains SGI)</i>
Mr. R. E. Martin, NRR Project Manger – Farley	(letter only)
Mr. C. Gratton, NRR Project Manager – Hatch	(letter only)
Mr. C. Gratton, NRR Project Manager – Vogtle	(letter only)
Mr. C. Gratton, NRR Project Manager	<i>(Contains SGI)</i>
Mr. C. A. Patterson, Senior Resident Inspector – Farley	(letter only)
Mr. D. S. Simpkins, Senior Resident Inspector – Hatch	(letter only)
Mr. G. J. McCoy, Senior Resident Inspector – Vogtle	(letter only)
Assistant General Counsel for Materials Litigation and Enforcement	<i>(Contains SGI)</i>
Document Control Desk (original plus 3 copies)	<i>(Contains SGI)</i>

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