

September 7, 2005

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

SUBJECT: EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2 RE: REVISED
SCHEDULE FOR RESPONSE TO NRC GENERIC LETTER 2003-01

Dear Mr. Sumner:

By letter dated October 27, 2004, you stated that Southern Nuclear Operating Company (SNC) intended to revise the schedule you had previously provided by letters dated August 4, 2003, and March 29, 2004, to the U.S. Nuclear Regulatory Commission (NRC) staff for responding to NRC Generic Letter (GL) 2003-01, "Control Room Habitability," for the Edwin I. Hatch Nuclear Plant (Hatch), Units 1 and 2. Specifically, your letter indicated that you intended to perform American Society for Testing and Materials (ASTM) E741 tracer gas testing at HNP within 120 days following NRC approval for implementation of an alternate source term (AST) in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.67, "Accident source term." You also stated that you planned to submit the amendment request supporting full scope implementation of an AST in accordance with Regulatory Guide 1.183, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors," by December 31, 2004.

As you know, the purpose of GL 2003-01 was to alert licensees to findings that the control room licensing design bases and regulatory requirements may not be met at some plants and that existing technical specification requirements may not be adequate. Further, the GL emphasized the importance of reliable, comprehensive surveillance testing to verify CR habitability and requested that addressees submit information that demonstrated that its CR complies with the current licensing and design bases. The NRC staff requested that licensees provide the information asked for in the GL within 180 days from the date of the generic letter.

The NRC staff considered the alternative approach you proposed in your letter dated October 27, 2004, and but finds linking the scheduling of tracer gas testing to the approval of an AST amendment for which there is no certainty of NRC staff approval to be an unacceptable means of responding to GL 2003-01.

Please note that the NRC staff provided guidance on the use of AST analysis methods as part of operability determinations in a letter from Mr. Eric Leeds, NRR to Mr. James Davis, Nuclear Energy Institute (NEI), dated January 30, 2004, in response to a draft NEI white paper on control room habitability. In the January 30, 2004, letter, the NRC staff recognized the acceptability of using AST analytical methods in operability determinations, provided the analytical results are expressed in a manner consistent with the current licensing bases

acceptance criteria for control room habitability (i.e., whole body and critical organ dose for plants with a licensing basis source term derived from U.S. Atomic Energy Commission TID-14844, "Calculations of Distance Factors for Power and Test Reactor Sites"). Some licensees have found it prudent to complete a bounding operability determination of control room in-leakage using AST analytical methods as part of preparations for tracer gas testing. These licensees have stated that having completed a bounding operability determination allows them to more quickly determine appropriate actions after tracer gas testing is completed.

In summary, given the time that has elapsed since the GL was issued, notwithstanding the fact that SNC has not submitted the AST amendment for Hatch referenced in the October 27, 2004, letter, the NRC staff considers it inappropriate to make the response to GL 2003-01 and the determination of the CRE integrity issue contingent upon approval of an AST license amendment. Approval of an AST amendment request does not affect the existing condition of the Hatch CRE. In order to be responsive to GL 2003-01, SNC should take appropriate actions to confirm the inleakage characteristics of the CRE in a timely manner. Please provide the NRC staff a revised schedule for responding to GL 2003-01 within 60 days of the receipt of this letter.

If you have questions concerning this matter, please contact me.

Sincerely,

/RA/

Christopher Gratton, Sr. Project Manager, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-321 and 50-366

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