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October 30, 2006

Docket Nos.: 50-321
50-366

NL-06-2046

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

Edwin I. Hatch Nuclear Plant
Technical Specifications Revision Request
Section 5.3.1 - Unit Staff Qualifications

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 5.3.1 of the Plant Hatch Technical Specifications to (1) improve administrative flexibility and clarity in the wording of the specification and (2) replace a specific position title with a generic position title for the senior individual in charge of Health Physics. The proposed changes will reduce the regulatory burden of having to make future requests to revise Section 5.3.1 whenever a position title change is made. The proposed changes will also provide the flexibility to use an accredited program for qualifying unit staff positions.

Enclosure 1 provides a description and justification for the proposed change. Enclosure 2 contains a 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 approval of the proposed changes by September 30, 2007 with the amendment being implemented within 90 days.

Mr. L. M. Stinson 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



L. M. Stinson

Sworn to and subscribed before me this 30th day of October, 2006.


Notary Public

My commission expires July 5, 2010

LMS/PAH/daj

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

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President
Mr. D. R. Madison, General Manager – Plant Hatch
RTYPE: CHA02.004

U. S. Nuclear Regulatory Commission
Dr. W. D. Travers, Regional Administrator
Mr. C. Gratton, 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
Section 5.3.1-Unit Staff Qualifications

Description and Justification for Proposed Change

Enclosure 1

Edwin I. Hatch Nuclear Plant Technical Specifications Revision Section 5.3.1-Unit Staff Qualifications

Description and Justification for Proposed Change

Description

The Edwin I. Hatch Nuclear Plant (HNP) 1 and HNP 2 Technical Specifications Administrative Controls Section 5.3.1 currently requires each member of the unit staff to meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Health Physics Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The specific position title reference to the "Health Physics Superintendent" is proposed to be changed to the "senior individual in charge of Health Physics." Additionally, it is proposed to add a statement to Section 5.3.1 that will allow unit staff positions to be filled by personnel who have completed an accredited program that has been endorsed by the Nuclear Regulatory Commission (NRC), in lieu of the qualification requirements referenced above, such as a program accredited by the National Nuclear Accrediting Board and endorsed by the Institute of Nuclear Power Operations (INPO).

Justification

The proposed changes to HNP 1 and HNP 2 Technical Specification Administrative Controls Section 5.3.1 are requested to reduce the regulatory burden of having to make future requests to revise Section 5.3.1 whenever a position title change is made. The proposed changes will also provide the flexibility to use an accredited program (e.g., as described in Regulatory Issue Summary 2001-01, Eligibility of Operator License Applicants) for qualifying unit staff positions. Accordingly, the proposed changes will not adversely impact the HNP organizational structure or personnel qualification program. Lines of authority for plant operations are also unaffected by the proposed changes.

Removal of the specific title designation of Health Physics Superintendent and replacing it with a more generic reference to the senior individual in charge of Health Physics will reduce the regulatory burden of having to make future requests to revise Section 5.3.1 whenever a title change for this position is implemented. Additionally, the proposed change will not reduce the level of authority for this position. These changes will ensure that the senior individual in charge of Health Physics meets or exceeds the qualifications for the radiation protection manager specified in Regulatory Guide 1.8, September 1975.

SNC also proposes to revise Section 5.3.1 to provide flexibility in establishing the qualification requirements for personnel placement in unit staff positions, by adding a statement that will allow these positions to be filled by personnel who have completed an accredited program that has been endorsed by the NRC. The alternative use of an accredited program that has been endorsed by the NRC will ensure the educational requirements and power plant experience for each unit staff position are satisfied. Accordingly, the overall level of qualification of the unit staff will not be reduced.

Enclosure 2

Edwin I. Hatch Nuclear Plant
Technical Specifications Revision
Section 5.3.1-Unit Staff Qualifications

10 CFR 50.92 Significant Hazards Evaluation and Environmental Assessment

Enclosure 2

Edwin I. Hatch Nuclear Plant Technical Specifications Revision Section 5.3.1-Unit Staff Qualifications

10 CFR 50.92 Significant Hazards Evaluation and Environmental Assessment

Proposed Change

The specific position title reference to the “Health Physics Superintendent” in the Edwin I. Hatch Nuclear Plant (HNP) 1 and HNP 2 Technical Specifications Administrative Controls Section 5.3.1 is proposed to be changed to the “senior individual in charge of Health Physics.” Additionally, it is proposed to add a statement to Section 5.3.1 that will provide the flexibility to fill unit staff positions with personnel who have completed an accredited program that has been endorsed by the Nuclear Regulatory Commission (NRC), such as a program accredited by the National Nuclear Accrediting Board and endorsed by Institute of Nuclear Power Operations (INPO).

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 request and has determined that its adoption 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 5.3.1 involves the use of a more generic designation for the unit staff position responsible for Health Physics without reducing the level of authority required for that position. The proposed change also allows the flexibility to use an accredited program for qualifying personnel to fill unit staff positions, which represents an acceptable alternative to the qualification requirements for these positions as currently specified in the Technical Specifications. Since the proposed changes are administrative in nature, they do not involve any physical changes to any structures, systems, or components, nor will their performance requirements be altered. The proposed changes also do 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 changes do not involve a significant increase or any increase in the probability or consequences of an accident previously evaluated.

Enclosure 2

Edwin I. Hatch Nuclear Plant Technical Specifications Revision Section 5.3.1-Unit Staff Qualifications

10 CFR 50.92 Significant Hazards Evaluation and Environmental Assessment

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

The proposed changes to the Technical Specifications will have no adverse impact on the overall qualification of the unit staff. The use of a more generic designation for the unit staff position responsible for Health Physics and the alternative use of an accredited program that has been endorsed by the NRC will ensure the educational requirements and power plant experience for each unit staff position are properly satisfied and will continue to fulfill 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 proposed changes. 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 changes to the Technical Specifications will have no adverse impact on the onsite organizational features necessary to assure safe operation of the plant. Lines of authority for plant operation are unaffected by the proposed changes. Also, the adoption of the more generic designation of the individual responsible for Health Physics will reduce the regulatory burden of having to devote limited resources to process a license amendment whenever a title change for this position is implemented. Accordingly, this reduction in regulatory burden and the option to use an accredited program endorsed by NRC to qualify the unit staff will improve plant efficiency without compromising plant safety. Therefore, the proposed changes do not involve a significant decrease in the margin of safety.

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

Environmental Assessment

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 changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9), and an environmental assessment of the proposed changes is not required.

Enclosure 3

Edwin I. Hatch Nuclear Plant
Technical Specifications Revision
Section 5.3.1-Unit Staff Qualifications

Marked-up Technical Specifications Pages

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, ~~except for the Health Physics Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.~~

for the Radiation Protection Manager specified in

Personnel who complete an accredited program which has been endorsed by the NRC shall meet the requirements of the accredited program in lieu of the above. The senior individual in charge of Health Physics

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Enclosure 4

**Edwin I. Hatch Nuclear Plant
Technical Specifications Revision
Section 5.3.1-Unit Staff Qualifications**

Clean Typed Technical Specifications Pages

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