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Docket Nos.: 50-321  
50-366

NL-06-2618

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

**Edwin I. Hatch Nuclear Plant, Units 1 and 2**  
**Notification of Deviation from BWRVIP-130**

Ladies and Gentlemen:

Per agreement with the BWRVIP (References 1 and 2) participating licensees will notify the staff of a decision not to implement approved guidance. Plant Hatch Units 1 and 2 will not fully implement guidance with respect to continuous monitoring of feedwater dissolved oxygen contained in the BWR Water Chemistry Guidelines.

BWR Water Chemistry Guidelines (BWRVIP-130) provide criteria for the monitoring and control of BWR water chemistry. Table 6-6 of the BWRVIP-130 requires that Feedwater (FW) Dissolved Oxygen (DO) be monitored continuously and that DO be maintained between 30 and 200 ppb when >10% power. Contrary to this requirement, neither unit at Plant Hatch has continuous FW DO meters or recorders although periodic sampling is routinely conducted. DO is a control parameter per BWRVIP-130 and thus a "needed" element per BWRVIP-130 and NEI 03-08. Not meeting the BWRVIP-130 requirement thus necessitates a deviation disposition to justify the condition.

A deviation disposition has been approved in accordance with industry guidance and SNC internal procedures. Hatch uses continuous condensate booster pump discharge DO measurements as the controlling parameter for action levels per BWRVIP-130. A comparative study of the two parameters conducted by SNC in 2005 demonstrated that measuring condensate booster pump discharge DO is an acceptable alternative to FW DO monitoring. This provides reasonable assurance that the use of condensate booster pump discharge as the control parameter is acceptable and that there are no safety implications or reliability concerns with the deviation.

Sincerely,

A handwritten signature in black ink, appearing to read "L. M. Stinson".

L. M. Stinson

LMS/MNW/daj

References: 1. Letter 97-461 dated May 30, 1997 from Carl Terry, Chairman, BWR  
Vessel and Internals Project to Brian Sheron, NRC  
2. Letter 97-870 dated October 30, 1997 from Carl Terry, Chairman, BWR  
Vessel and Internals Project to Brian Sheron, NRC

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. R. E. Martin, NRR Project Manager – Hatch  
Mr. D. S. Simpkins, Senior Resident Inspector – Hatch