

**Jeffrey T. Gasser**  
Executive Vice President  
and Chief Nuclear Officer

**Southern Nuclear  
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January 30, 2007

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

NL-07-0084

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

Joseph M. Farley Nuclear Plant  
Edwin I. Hatch Nuclear Plant  
Vogtle Electric Generating Plant  
License Amendment Request to Revise Technical Specifications  
Southern Nuclear Operating Company Reorganization

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) is submitting a request for an amendment to the technical specifications (TS) for Joseph M. Farley Nuclear Plant (FNP) Units 1 and 2, Edwin I. Hatch Nuclear Plant (HNP) Units 1 and 2, and Vogtle Electric Generating Plant (VEGP) Units 1 and 2.

Southern Nuclear Operating Company has evaluated the benefits associated with changes to the organization structure and decided to move to a site vice president organizational structure. The evaluation included careful consideration of the licensing requirements and commitments of SNC as the licensed operator of the FNP, HNP, and VEGP. The resulting structure is common in the nuclear industry and places a vice president at each plant site and eliminates the Project Vice President position at the corporate office.

In addition, to facilitate implementation of the site vice president organizational structure, the position of Vice President, Fleet Operations Support has been added and will be responsible for Nuclear Fleet Security and Emergency Preparedness, in conjunction with the responsibilities previously performed by the Fleet Support General Manager. The Fleet Support General Manager position is being eliminated.

Enclosure 1 provides the evaluation for the proposed TS change which includes a detailed description of the change, technical evaluation, applicable regulatory requirements, significant hazards consideration, and environmental consideration. Enclosure 2 provides the FNP marked-up TS pages. Enclosure 3 provides the FNP clean-typed TS pages. Enclosure 4 provides the HNP marked-up TS pages. Enclosure 5 provides the HNP clean-typed TS pages. Enclosure 6 provides the VEGP marked-up TS pages. Enclosure 7 provides the VEGP clean-typed TS pages. Enclosure 8 provides the VEGP marked-up TS Bases pages.

SNC requests approval of the proposed license amendments by May 1, 2007. The proposed changes would be implemented within 30 days of issuance of the amendment.

Mr. J. T. Gasser states he is Executive Vice President and Chief Nuclear Officer 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.

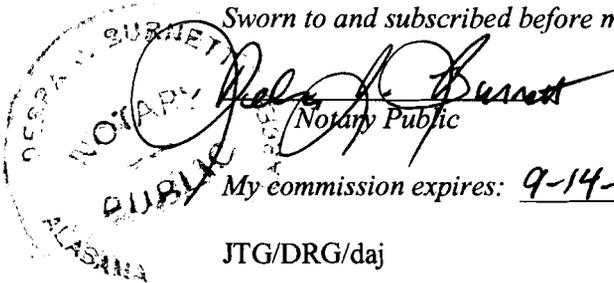
Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Jeffrey T. Gasser

Sworn to and subscribed before me this 30<sup>th</sup> day of January, 2007.



Notary Public

My commission expires: 9-14-10

JTG/DRG/daj

- Enclosures:
1. Evaluation of the Proposed Change
  2. Marked-up FNP Technical Specifications Pages
  3. Clean Typed FNP Technical Specifications Pages
  4. Marked-up HNP Technical Specifications Pages
  5. Clean Typed HNP Technical Specifications Pages
  6. Marked-up VEGP Technical Specifications Pages
  7. Clean Typed VEGP Technical Specifications Pages
  8. Marked-up VEGP Technical Specifications Bases Pages

cc: Southern Nuclear Operating Company  
Mr. J. R. Johnson, Vice President – Farley  
Mr. D. R. Madison, Vice President – Hatch  
Mr. T. E. Tynan, Vice President – Vogtle  
RType: CFA04.054; CHA02.004; CVC7000; LC# 14533

U. S. Nuclear Regulatory Commission  
Dr. W. D. Travers, Regional Administrator  
Ms. K. R. Cotton, NRR Project Manager – Farley  
Mr. R. E. Martin, NRR Project Manager – Hatch  
Mr. B. K. Singal, NRR Project Manager – Vogtle  
Mr. C. A. Patterson, Senior Resident Inspector – Farley  
Mr. D. S. Simpkins, Senior Resident Inspector – Hatch  
Mr. G. J. McCoy, Senior Resident Inspector – Vogtle

**Enclosure 1**

**Joseph M. Farley Nuclear Plant  
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**Evaluation of the Proposed Change**

## Enclosure 1

**Joseph M. Farley Nuclear Plant  
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### 1. Summary Description

Southern Nuclear Operating Company has evaluated the benefits associated with changes to the organization structure and decided to move to a site vice president organizational structure. The resulting structure is common in the nuclear industry and places a vice president at each plant site and eliminates the project vice president position at the corporate office. To facilitate implementation of the site vice president organizational structure, the position of fleet support general manager has been replaced by the vice president, fleet operations support reporting to the executive vice president. The vice president, fleet operations support will be responsible for nuclear fleet security and emergency preparedness, in conjunction with the responsibilities previously performed by the fleet support general manager. This license amendment request proposes to revise the technical specifications (TS) for Joseph M. Farley Nuclear Plant (FNP) Units 1 and 2, Edwin I. Hatch Nuclear Plant (HNP) Units 1 and 2, and Vogtle Electric Generating Plant (VEGP) Units 1 and 2 to reflect the organization change. SNC letter NL-07-0034, dated January 8, 2007, provided notification to the NRC of the above described management changes.

### 2. Detailed Description

#### FNP TS Proposed Title Changes

- |                       |                                                                                                                                                                                              |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| TS paragraph 5.1.1    | Change the "General Manager – Nuclear Plant" to "Plant Manager" in the first paragraph.<br><br>Change "General Manager- Nuclear Plant" to "Vice President – Farley" in the second paragraph. |
| TS paragraph 5.2.1.b. | Change "General Manager – Nuclear Plant" to "Plant Manager."                                                                                                                                 |
| TS paragraph 5.2.1.c. | Change "Vice-President" to "Vice President – Farley."                                                                                                                                        |
| TS paragraph 5.2.2.e. | Change "General Manager – Nuclear Plant" to "Plant Manager" in the third paragraph.                                                                                                          |
| TS paragraph 5.2.2.f. | Change "Assistant General Manager – Plant Operations" to "Plant Manager."                                                                                                                    |
| TS paragraph 5.5.1    | Change "General Manager - Nuclear Plant" to "Vice President – Farley" in paragraph 5.5.1.b under the heading "Licensee initiated changes to the ODCM."                                       |

## Enclosure 1

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### **HNP Unit 1 TS Proposed Title Changes**

- TS paragraph 2.2.3      Change “corporate executive responsible for overall plant nuclear safety,” to “Vice President – Hatch.”
- TS paragraph 2.2.4      Capitalize “plant manager.”
- Change “corporate executive responsible for overall plant nuclear safety,” to “Vice President – Hatch.”
- TS paragraph 5.1.1      Change “plant manager” to “Vice President – Hatch.”
- TS paragraph 5.1.2      Change “An assistant plant manager” to “The Plant Manager” in the first sentence.
- Delete “, except for the Radiological Environmental Monitoring Program as described below.”
- Change “an assistant plant manager” to “the Site Support Manager” in the last sentence.
- TS paragraph 5.1.3      Capitalize “plant manager.”
- TS paragraph 5.2.1.b.    Change “An assistant plant manager” to “The Plant Manager.”
- TS paragraph 5.2.1.c.    Change “The corporate executive responsible for Plant Hatch shall take any measures needed to ensure acceptable performance of the staff . . .” to “The Vice President – Hatch shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff. . . .”
- TS paragraph 5.2.2.e.    Change “an assistant plant manager” to “the Plant Manager” in the next to last paragraph.
- Change “an assistant plant manager” to “the Plant Manager” in the last paragraph.
- TS paragraph 5.2.2.f.    Capitalize “operations manager.”

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TS paragraph 5.5.1. Change “plant manager” to “Vice President – Hatch” in paragraph 5.5.1.b. under the heading “Licensee initiated changes to the ODCM.”

**HNP Unit 2 TS Proposed Title Changes**

TS paragraph 2.2.3 Change “corporate executive responsible for overall plant nuclear safety,” to “Vice President – Hatch.”

TS paragraph 2.2.4 Capitalize “plant manager.”

Change “corporate executive responsible for overall plant nuclear safety,” to “Vice President – Hatch.”

TS paragraph 5.1.1 Change “plant manager” to “Vice President – Hatch.”

TS paragraph 5.1.2 Change “An assistant plant manager” to “The Plant Manager” in the first sentence.

Delete “, except for the Radiological Environmental Monitoring Program as described below.”

Change “an assistant plant manager” to “the Site Support Manager” in the last sentence.

TS paragraph 5.1.3 Capitalize “plant manager.”

TS paragraph 5.2.1.b. Change “An assistant plant manager” to “The Plant Manager.”

TS paragraph 5.2.1.c. Change “The corporate executive responsible for Plant Hatch shall take any measures needed to ensure acceptable performance of the staff . . .” to “The Vice President – Hatch shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff. . . .”

TS paragraph 5.2.2.e. Change “an assistant plant manager” to “the Plant Manager” in the next to last paragraph.

Change “an assistant plant manager” to “the Plant Manager” in the last paragraph.

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- TS paragraph 5.2.2.f. Capitalize “operations manager.”
- TS paragraph 5.5.1. Change “plant manager” to “Vice President – Hatch” in paragraph 5.5.1.b. under the heading “Licensee initiated changes to the ODCM.”

### **VEGP TS Proposed Title Changes**

- TS paragraph 2.2.4 Change the “General Manager- Nuclear Plant” to “Plant Manager.”
- Change “Vice President – Nuclear” to “Vice President – Vogtle.”
- TS paragraph 5.1.1 Change the “General Manager – Nuclear Plant” to “Plant Manager” in the first paragraph.
- Change “General Manager - Nuclear Plant” to “Vice President – Vogtle” in the second paragraph.
- TS paragraph 5.2.1.b. Change “General Manager – Nuclear Plant” to “Plant Manager.”
- TS paragraph 5.2.1.c. Change “Vice-President - Nuclear” to “Vice President – Vogtle.”
- TS paragraph 5.2.2.e. Change “General Manager - Nuclear Plant” to “Plant Manager” in the third paragraph.
- TS paragraph 5.5.1.b. Change “General Manager- Nuclear Plant” to “Vice President – Vogtle.”

### **3. Technical Evaluation**

Southern Nuclear Operating Company has evaluated the benefits associated with changes to the organization structure and decided to move to a site vice president organizational structure. The evaluation included careful consideration of the licensing requirements and commitments of SNC as the licensed operator of the Joseph M. Farley Nuclear Plant, the Edwin I. Hatch Nuclear Plant, and the Vogtle Electric Generating Plant. The resulting structure is common in the nuclear industry and places a vice president at each plant site and eliminates the project vice president position at the corporate office.

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The changes to the organization structure will not change the unit organization requirements or staff qualification requirements contained in the plant Technical Specifications. Line management as required by the plant Technical Specifications also remains unchanged.

#### **4. Regulatory Evaluation**

##### **4.1. Applicable Regulatory Requirements/Criteria**

10 CFR 50, Appendix B, Criterion I., "Organization" states:

"...The persons and organizations performing quality assurance functions shall have sufficient authority and organizational freedom to identify quality problems; to initiate, recommend, or provide solutions; and to verify implementation of solutions. Such persons and organizations performing quality assurance functions shall report to a management level such that this required authority and organizational freedom, including sufficient independence from cost and schedule when opposed to safety considerations, are provided. Because of the many variables involved, such as the number of personnel, the type of activity being performed, and the location or locations where activities are performed, the organizational structure for executing the quality assurance program may take various forms provided that the persons and organizations assigned the quality assurance functions have this required authority and organizational freedom. Irrespective of the organizational structure, the individual(s) assigned the responsibility for assuring effective execution of any portion of the quality assurance program at any location where activities subject to this appendix are being performed shall have direct access to such levels of management as may be necessary to perform this function."

Evaluations in accordance with 10 CFR 50.54(a) have been performed regarding the necessary revisions to each of the plant's Quality Assurance (QA) Programs to facilitate these changes. The changes to the organization structure do not affect the operational QA support function since the reporting relationship of the QA manager to the SNC executive vice president and the responsibilities of the onsite QA staff remain unchanged. The QA staff will continue to have the requisite authority necessary as well as the organizational freedom required to ensure the QA function remains independent.

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**4.2. Significant Hazards Consideration**

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 has reviewed the proposed license amendment and has concluded that the change does not involve a significant hazards consideration 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 FNP, HNP, and VEGP TS involves SNC moving to a site vice president organizational structure. Since the proposed change is administrative in nature, it does not involve any physical changes to any structures, systems, or components, nor will their performance requirements be altered. The proposed change also does 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 change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

As a result of the proposed change to the FNP, HNP, and VEGP TS, the qualification requirements for the unit staff position will remain unchanged and the plant staff will continue to meet 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 change. Therefore, the possibility of a new or different kind of accident from any previously evaluated is not created.

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3. Does the proposed change involve a significant decrease in the margin of safety?

The proposed change to the FNP, HNP, and VEGP TS will have no adverse impact on the onsite organizational features necessary to assure safe operation of the plant since the qualification requirements for the unit staff remains unchanged. Since the proposed change is administrative in nature, it does not involve any physical changes to any structures, systems, or components, nor will their performance requirements be altered. Therefore, the proposed change does not involve a significant decrease in the margin of safety.

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

**5. Environmental Consideration**

10 CFR 51.22(c)(9) provides criteria for identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed license amendment will not:

1. Involve a significant hazards consideration,
2. Result in a significant change in the types, or a significant increase in the amounts, of any effluents that may be released offsite, or
3. Result in a significant increase in individual or cumulative occupational radiation exposure.

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

Enclosure 2

Joseph M. Farley Nuclear Plant  
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Marked-up FNP Technical Specifications Pages

## 5.0 ADMINISTRATIVE CONTROLS

### 5.1 Responsibility

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5.1.1 The ~~Plant~~ ~~General Manager—Nuclear Plant~~ shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

The ~~Vice President - Farley~~ ~~General Manager—Nuclear Plant~~ or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.

5.1.2 A Senior Reactor Operator (SRO) shall be responsible for the control room command function. During any absence of the responsible SRO from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active SRO license shall be designated to assume the control room command function. During any absence of the responsible SRO from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function. A single individual may be responsible for the control room command function for both units.

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## 5.0 ADMINISTRATIVE CONTROLS

### 5.2 Organization

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#### 5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR;
- b. The ~~Plant~~ General Manager—Nuclear Plant shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
- c. The ~~Vice- President - Farley~~ shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

#### 5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, 3, or 4. With both units in MODES 5 or 6 or defueled, a total of three non-licensed operators are required.

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(continued)

## 5.2 Organization

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### 5.2.2 Unit Staff (continued)

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time;
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines for the minimum shift compliment defined in Specifications 5.2.2.a and b and health physics technicians shall be reviewed and approved by the Plant Manager~~General Manager~~  
~~Nuclear Plant~~, his designee, or by higher levels of management.

Any deviation from the above guidelines for key maintenance personnel shall be reviewed and approved by the Maintenance Manager or his designee.

- f. The ~~Assistant General Manager – Plant Operations~~Plant Manager or the Operations Manager shall hold an SRO license.
  - g. The Shift Technical Advisor (STA) shall provide advisory technical support to the responsible SRO in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. The same individual may fill this position for both units.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.5 Programs and Manuals

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The following programs shall be established, implemented, and maintained.

#### 5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release Reports required by Specification 5.6.2 and Specification 5.6.3.

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
  1. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
  2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
- b. Shall become effective after the approval of the Vice President - Farley General Manager - Nuclear Plant; and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

(continued)

Enclosure 3

Joseph M. Farley Nuclear Plant  
License Amendment Request to Revise Technical Specifications  
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Clean Typed FNP Technical Specifications Pages

## 5.0 ADMINISTRATIVE CONTROLS

### 5.1 Responsibility

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- 5.1.1 The Plant Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.
- The Vice President - Farley or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.
- 5.1.2 A Senior Reactor Operator (SRO) shall be responsible for the control room command function. During any absence of the responsible SRO from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active SRO license shall be designated to assume the control room command function. During any absence of the responsible SRO from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function. A single individual may be responsible for the control room command function for both units.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.2 Organization

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#### 5.2.1 Onsite and Offsite Organizations

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- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR;
- b. The Plant Manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
- c. The Vice President - Farley shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

#### 5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, 3, or 4. With both units in MODES 5 or 6 or defueled, a total of three non-licensed operators are required.

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## 5.2 Organization

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### 5.2.2 Unit Staff (continued)

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time;
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines for the minimum shift compliment defined in Specifications 5.2.2.a and b and health physics technicians shall be reviewed and approved by the Plant Manager, his designee, or by higher levels of management.

Any deviation from the above guidelines for key maintenance personnel shall be reviewed and approved by the Maintenance Manager or his designee.

- f. The Plant Manager or the Operations Manager shall hold an SRO license.
  - g. The Shift Technical Advisor (STA) shall provide advisory technical support to the responsible SRO in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. The same individual may fill this position for both units.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.5 Programs and Manuals

---

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- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release Reports required by Specification 5.6.2 and Specification 5.6.3.

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
  1. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
  2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
- b. Shall become effective after the approval of the Vice President - Farley; and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

(continued)

Enclosure 4

Edwin I. Hatch Nuclear Plant  
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Marked-up HNP Technical Specifications Pages

## 2.0 SAFETY LIMITS (SLs)

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### 2.1 SLs

#### 2.1.1 Reactor Core SLs

2.1.1.1 With the reactor steam dome pressure < 785 psig or core flow < 10% rated core flow:

THERMAL POWER shall be  $\leq$  24% RTP.

2.1.1.2 With the reactor steam dome pressure  $\geq$  785 psig and core flow  $\geq$  10% rated core flow:

MCPR shall be  $\geq$  1.07 for two recirculation loop operation or  $\geq$  1.09 for single recirculation loop operation.

2.1.1.3 Reactor vessel water level shall be greater than the top of active irradiated fuel.

#### 2.1.2 Reactor Coolant System (RCS) Pressure SL

Reactor steam dome pressure shall be  $\leq$  1325 psig.

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### 2.2 SL Violations

With any SL violation, the following actions shall be completed:

2.2.1 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.

2.2.2 Within 2 hours:

2.2.2.1 Restore compliance with all SLs; and

2.2.2.2 Insert all insertable control rods.

2.2.3 Within 24 hours, notify the ~~pPlant m~~Manager, the Vice President - Hatch~~corporate executive responsible for overall plant nuclear safety~~, and the offsite review committee.

(continued)

## 2.0 SAFETY LIMITS (SLs)

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### 2.2 SL Violations (continued)

2.2.4 Within 30 days, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC, the offsite review committee, the ~~p~~Plant ~~m~~Manager, and the Vice President - Hatch corporate executive responsible for overall plant nuclear safety.

2.2.5 Operation of the unit shall not be resumed until authorized by the NRC.

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## 5.0 ADMINISTRATIVE CONTROLS

### 5.1 Responsibility

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- 5.1.1 The ~~Vice President - Hatch~~ plant manager shall provide direct executive oversight over all aspects of Plant Hatch.
- 5.1.2 ~~The An assistant p~~Plant mManager shall be responsible for overall unit operation, ~~except for the Radiological Environmental Monitoring Program as described below~~ and for delegation in writing of the succession of this responsibility during his absence. Certain plant support functions shall also be the responsibility of ~~the an Site Support~~assistant plant mManager.
- 5.1.3 The pPlant mManager or his designee shall be responsible for the Radiological Environmental Monitoring Program and for the writing of the Annual Radiological Environmental Operating Report.
- 5.1.4 Each of the individuals in Specification 5.1.1 through Specification 5.1.3 is responsible for the accuracy of the procedures needed to implement his responsibilities.
- 5.1.5 A Senior Reactor Operator (SRO) shall be responsible for the control room command function. During any absence of the responsible SRO from the control room while either unit is in MODE 1, 2, or 3, an individual with an active SRO license shall be designated to assume the control room command function. During any absence of the responsible SRO from the control room while both units are in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.2 Organization

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#### 5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including plant specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the Plant Hatch Unit 1 FSAR;
- b. ~~The An assistant p~~ Plant m Manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
- c. ~~The Vice President - Hatch~~ corporate executive responsible for Plant Hatch shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

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#### 5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A total of three plant equipment operators (PEOs) for the two units is required in all conditions. At least one of the required PEOs shall be assigned to each reactor containing fuel.

(continued)

## 5.2 Organization

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### 5.2.2 Unit Staff

e. (continued)

Any deviation from the above guidelines shall be authorized by ~~the~~an ~~assistant p~~Plant m~~Manager~~ or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by ~~the~~an ~~assistant p~~Plant m~~Manager~~ or designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

f. The ~~e~~O~~perations m~~Manager shall hold an active or inactive SRO license.

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the shift supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

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## 5.0 ADMINISTRATIVE CONTROLS

### 5.5 Programs and Manuals

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The following programs and manuals shall be established, implemented, and maintained.

#### 5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports required by Specification 5.6.2 and Specification 5.6.3, respectively.

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
  1. Sufficient information to support the change(s) and appropriate analyses or evaluations justifying the change(s), and
  2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and does not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by the onsite review committee and the approval of the ~~plant manager~~ Vice President - Hatch; and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

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(continued)

## 2.0 SAFETY LIMITS (SLs)

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### 2.1 SLs

#### 2.1.1 Reactor Core SLs

2.1.1.1 With the reactor steam dome pressure < 785 psig or core flow < 10% rated core flow:

THERMAL POWER shall be  $\leq$  24% RTP.

2.1.1.2 With the reactor steam dome pressure  $\geq$  785 psig and core flow  $\geq$  10% rated core flow:

MCPR shall be  $\geq$  1.08 for two recirculation loop operation or  $\geq$  1.10 for single recirculation loop operation.

2.1.1.3 Reactor vessel water level shall be greater than the top of active irradiated fuel.

#### 2.1.2 Reactor Coolant System (RCS) Pressure SL

Reactor steam dome pressure shall be  $\leq$  1325 psig.

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### 2.2 SL Violations

With any SL violation, the following actions shall be completed:

2.2.1 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.

2.2.2 Within 2 hours:

2.2.2.1 Restore compliance with all SLs; and

2.2.2.2 Insert all insertable control rods.

2.2.3 Within 24 hours, notify the ~~pPlant m~~ Plant Manager, the Vice President - Hatch ~~corporate executive responsible for overall plant nuclear safety~~, and the offsite review committee.

(continued)

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## 2.0 SAFETY LIMITS (SLs)

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### 2.2 SL Violations (continued)

2.2.4 Within 30 days, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC, the offsite review committee, the ~~p~~Plant ~~m~~Manager, and the Vice President - Hatch~~corporate executive responsible for overall plant nuclear safety.~~

2.2.5 Operation of the unit shall not be resumed until authorized by the NRC.

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## 5.0 ADMINISTRATIVE CONTROLS

### 5.1 Responsibility

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- 5.1.1 The ~~Vice pPresident - Hatch~~ ~~plant manager~~ shall provide direct executive oversight over all aspects of Plant Hatch.
- 5.1.2 ~~The An assistant pPlant mManager~~ shall be responsible for overall unit operation, ~~except for the Radiological Environmental Monitoring Program as described below~~ and for delegation in writing of the succession of this responsibility during his absence. Certain plant support functions shall also be the responsibility of ~~thean Site Support~~ ~~assistant plant mManager~~.
- 5.1.3 The ~~pPlant mManager~~ or his designee shall be responsible for the Radiological Environmental Monitoring Program and for the writing of the Annual Radiological Environmental Operating Report.
- 5.1.4 Each of the individuals in Specification 5.1.1 through Specification 5.1.3 is responsible for the accuracy of the procedures needed to implement his responsibilities.
- 5.1.5 A Senior Reactor Operator (SRO) shall be responsible for the control room command function. During any absence of the responsible SRO from the control room while either unit is in MODE 1, 2, or 3, an individual with an active SRO license shall be designated to assume the control room command function. During any absence of the responsible SRO from the control room while both units are in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.2 Organization

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#### 5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including plant specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the Plant Hatch Unit 2 FSAR;
- b. ~~The~~An assistant pPlant mManager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
- c. The ~~yVice pPresident - Hatch~~corporate executive responsible for Plant Hatch shall have corporate responsibility for overall nuclear plant safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

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#### 5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A total of three plant equipment operators (PEOs) for the two units is required in all conditions. At least one of the required PEOs shall be assigned to each reactor containing fuel.

(continued)

## 5.2 Organization

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### 5.2.2 Unit Staff

- e. (continued)

Any deviation from the above guidelines shall be authorized by ~~an~~ the ~~assistant p~~ Plant m ~~Manager~~ or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by ~~the an assistant p~~ Plant m ~~Manager~~ or designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

- f. The ~~e~~ O ~~perations m~~ Manager shall hold an active or inactive SRO license.
- g. The Shift Technical Advisor (STA) shall provide advisory technical support to the shift supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.5 Programs and Manuals

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The following programs and manuals shall be established, implemented, and maintained.

#### 5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports required by Specification 5.6.2 and Specification 5.6.3, respectively.

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
  1. Sufficient information to support the change(s) and appropriate analyses or evaluations justifying the change(s), and
  2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and does not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by the onsite review committee and the approval of the ~~plant manager~~ Vice President - Hatch; and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

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(continued)

Enclosure 5

Edwin I. Hatch Nuclear Plant  
License Amendment Request to Revise Technical Specifications  
Southern Nuclear Operating Company Reorganization

Clean Typed HNP Technical Specifications Pages

## 2.0 SAFETY LIMITS (SLs)

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### 2.1 SLs

#### 2.1.1 Reactor Core SLs

2.1.1.1 With the reactor steam dome pressure < 785 psig or core flow < 10% rated core flow:

THERMAL POWER shall be  $\leq$  24% RTP.

2.1.1.2 With the reactor steam dome pressure  $\geq$  785 psig and core flow  $\geq$  10% rated core flow:

MCPR shall be  $\geq$  1.07 for two recirculation loop operation or  $\geq$  1.09 for single recirculation loop operation.

2.1.1.3 Reactor vessel water level shall be greater than the top of active irradiated fuel.

#### 2.1.2 Reactor Coolant System (RCS) Pressure SL

Reactor steam dome pressure shall be  $\leq$  1325 psig.

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### 2.2 SL Violations

With any SL violation, the following actions shall be completed:

2.2.1 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.

2.2.2 Within 2 hours:

2.2.2.1 Restore compliance with all SLs; and

2.2.2.2 Insert all insertable control rods.

2.2.3 Within 24 hours, notify the Plant Manager, the Vice President - Hatch and the offsite review committee.

(continued)

2.0 SAFETY LIMITS (SLs)

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2.2 SL Violations (continued)

2.2.4 Within 30 days, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC, the offsite review committee, the Plant Manager, and the Vice President - Hatch. |

2.2.5 Operation of the unit shall not be resumed until authorized by the NRC.

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## 5.0 ADMINISTRATIVE CONTROLS

### 5.1 Responsibility

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- 5.1.1 The Vice President - Hatch shall provide direct executive oversight over all aspects of Plant Hatch.
- 5.1.2 The Plant Manager shall be responsible for overall unit operation and for delegation in writing of the succession of this responsibility during his absence. Certain plant support functions shall also be the responsibility of the Site Support Manager.
- 5.1.3 The Plant Manager or his designee shall be responsible for the Radiological Environmental Monitoring Program and for the writing of the Annual Radiological Environmental Operating Report.
- 5.1.4 Each of the individuals in Specification 5.1.1 through Specification 5.1.3 is responsible for the accuracy of the procedures needed to implement his responsibilities.
- 5.1.5 A Senior Reactor Operator (SRO) shall be responsible for the control room command function. During any absence of the responsible SRO from the control room while either unit is in MODE 1, 2, or 3, an individual with an active SRO license shall be designated to assume the control room command function. During any absence of the responsible SRO from the control room while both units are in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.2 Organization

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#### 5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including plant specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the Plant Hatch Unit 1 FSAR;
  - b. The Plant Manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
  - c. The Vice President - Hatch shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and
  - d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.
- 

#### 5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A total of three plant equipment operators (PEOs) for the two units is required in all conditions. At least one of the required PEOs shall be assigned to each reactor containing fuel.

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(continued)

## 5.2 Organization

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### 5.2.2 Unit Staff

e. (continued)

Any deviation from the above guidelines shall be authorized by the Plant Manager or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager or designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

f. The Operations Manager shall hold an active or inactive SRO license.

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the shift supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

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## 5.0 ADMINISTRATIVE CONTROLS

### 5.5 Programs and Manuals

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The following programs and manuals shall be established, implemented, and maintained.

#### 5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports required by Specification 5.6.2 and Specification 5.6.3, respectively.

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
  1. Sufficient information to support the change(s) and appropriate analyses or evaluations justifying the change(s), and
  2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and does not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by the onsite review committee and the approval of the Vice President - Hatch; and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

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(continued)

## 2.0 SAFETY LIMITS (SLs)

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### 2.1 SLs

#### 2.1.1 Reactor Core SLs

2.1.1.1 With the reactor steam dome pressure < 785 psig or core flow < 10% rated core flow:

THERMAL POWER shall be  $\leq$  24% RTP.

2.1.1.2 With the reactor steam dome pressure  $\geq$  785 psig and core flow  $\geq$  10% rated core flow:

MCPR shall be  $\geq$  1.08 for two recirculation loop operation or  $\geq$  1.10 for single recirculation loop operation.

2.1.1.3 Reactor vessel water level shall be greater than the top of active irradiated fuel.

#### 2.1.2 Reactor Coolant System (RCS) Pressure SL

Reactor steam dome pressure shall be  $\leq$  1325 psig.

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### 2.2 SL Violations

With any SL violation, the following actions shall be completed:

2.2.1 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.

2.2.2 Within 2 hours:

2.2.2.1 Restore compliance with all SLs; and

2.2.2.2 Insert all insertable control rods.

2.2.3 Within 24 hours, notify the Plant Manager, the Vice President – Hatch, and the offsite review committee.

(continued)

## 2.0 SAFETY LIMITS (SLs)

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### 2.2 SL Violations (continued)

2.2.4 Within 30 days, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC, the offsite review committee, the Plant Manager, and the Vice President – Hatch.

2.2.5 Operation of the unit shall not be resumed until authorized by the NRC.

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## 5.0 ADMINISTRATIVE CONTROLS

### 5.1 Responsibility

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- 5.1.1 The Vice President – Hatch shall provide direct executive oversight over all aspects of Plant Hatch.
- 5.1.2 The Plant Manager shall be responsible for overall unit operation and for delegation in writing of the succession of this responsibility during his absence. Certain plant support functions shall also be the responsibility of the Site Support Manager.
- 5.1.3 The Plant Manager or his designee shall be responsible for the Radiological Environmental Monitoring Program and for the writing of the Annual Radiological Environmental Operating Report.
- 5.1.4 Each of the individuals in Specification 5.1.1 through Specification 5.1.3 is responsible for the accuracy of the procedures needed to implement his responsibilities.
- 5.1.5 A Senior Reactor Operator (SRO) shall be responsible for the control room command function. During any absence of the responsible SRO from the control room while either unit is in MODE 1, 2, or 3, an individual with an active SRO license shall be designated to assume the control room command function. During any absence of the responsible SRO from the control room while both units are in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.2 Organization

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#### 5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including plant specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the Plant Hatch Unit 2 FSAR;
  - b. The Plant Manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
  - c. The Vice President - Hatch shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and
  - d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.
- 

#### 5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A total of three plant equipment operators (PEOs) for the two units is required in all conditions. At least one of the required PEOs shall be assigned to each reactor containing fuel.

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(continued)

## 5.2 Organization

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### 5.2.2 Unit Staff

e. (continued)

Any deviation from the above guidelines shall be authorized by the Plant Manager or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager or designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

f. The Operations Manager shall hold an active or inactive SRO license.

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the shift supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

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## 5.0 ADMINISTRATIVE CONTROLS

### 5.5 Programs and Manuals

---

The following programs and manuals shall be established, implemented, and maintained.

#### 5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports required by Specification 5.6.2 and Specification 5.6.3, respectively.

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
  1. Sufficient information to support the change(s) and appropriate analyses or evaluations justifying the change(s), and
  2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and does not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by the onsite review committee and the approval of the Vice President - Hatch; and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

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(continued)

Enclosure 6

Vogtle Electric Generating Plant  
License Amendment Request to Revise Technical Specifications  
Southern Nuclear Operating Company Reorganization

Marked-up VEGP Technical Specifications Pages

## 2.0 SAFETY LIMITS (SLs)

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### 2.1 SLs

#### 2.1.1 Reactor Core SLs

In MODES 1 and 2, the combination of THERMAL POWER, Reactor Coolant System (RCS) highest loop average temperature, and pressurizer pressure shall not exceed the SLs specified in Figure 2.1.1-1.

#### 2.1.2 RCS Pressure SL

In MODES 1, 2, 3, 4, and 5, the RCS pressure shall be maintained  $\leq 2735$  psig.

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### 2.2 SL Violations

2.2.1 If SL 2.1.1 is violated, restore compliance and be in MODE 3 within 1 hour.

2.2.2 If SL 2.1.2 is violated:

2.2.2.1 In MODE 1 or 2, restore compliance and be in MODE 3 within 1 hour.

2.2.2.2 In MODE 3, 4, or 5, restore compliance within 5 minutes.

2.2.3 Within 1 hour notify the NRC Operations Center, in accordance with 10 CFR 50.72.

2.2.4 Within 24 hours, notify the ~~Plant~~ General Manager - Nuclear Plant and Vice President - ~~Vogtle~~ - Nuclear.

2.2.5 Within 30 days a Licensee Event Report (LER) shall be prepared and submitted to the NRC pursuant to 10 CFR 50.73.

2.2.6 Operation of the unit shall not be resumed until authorized by the NRC.

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## 5.0 ADMINISTRATIVE CONTROLS

### 5.1 Responsibility

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5.1.1 The ~~Plant General Manager – Nuclear Plant~~ shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

The ~~Plant General Manager – Nuclear Plant~~ Vice President – Vogtle or his designee shall approve, prior to implementation, each proposed test, experiment, or modification to systems or equipment that affect nuclear safety.

5.1.2 A Senior Reactor Operator (SRO) shall be responsible for the control room command function while either unit is in MODES 1, 2, 3, or 4, or it is acceptable to designate an SRO as responsible for the control room command function for each unit. While both units are in MODE 5, 6, or defueled, an SRO or Reactor Operator (RO) shall be designated to assume the control room command function.

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## 5.0 ADMINISTRATIVE CONTROLS

### 5.2 Organization

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#### 5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR;
- b. The ~~Plant~~ General Manager—~~Nuclear Plant~~ shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
- c. The Vice President - ~~Vogtle~~—~~Nuclear~~ shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

#### 5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A non-licensed operator shall be assigned to each reactor and an additional non-licensed operator shall be assigned for the control room when a reactor is operating in MODES 1,

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(continued)

5.2 Organization

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5.2.2 Unit Staff (continued)

event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time;
2. An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time;
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time;
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the applicable department manager or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual excess overtime shall be reviewed monthly by the Plant Manager~~General Manager~~ ~~-Nuclear Plant~~ or his designee to assure that excessive hours were authorized and that they do not become routine.

- f. The Operations Manager shall hold an SRO license.
- g. An individual shall be assigned who provides technical support in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall be available for duty when the plant is in modes 1-4. At other times, this individual is not required. In addition, this individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. This position may also be filled by the Shift Superintendent or

(continued)

## 5.0 ADMINISTRATIVE CONTROLS

### 5.5 Programs and Manuals

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The following programs shall be established, implemented, and maintained.

#### 5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the Radioactive Effluent Controls and Radiological Environmental Monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports required by Specification 5.6.2 and Specification 5.6.3.

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
  1. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s),
  2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
- b. Shall become effective after the approval of the ~~Plant General Manager - Nuclear Plant~~ Vice President - Vogtle; and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page

(continued)

Enclosure 7

Vogtle Electric Generating Plant  
License Amendment Request to Revise Technical Specifications  
Southern Nuclear Operating Company Reorganization

Clean Typed VEGP Technical Specifications Pages

## 2.0 SAFETY LIMITS (SLs)

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### 2.1 SLs

#### 2.1.1 Reactor Core SLs

In MODES 1 and 2, the combination of THERMAL POWER, Reactor Coolant System (RCS) highest loop average temperature, and pressurizer pressure shall not exceed the SLs specified in Figure 2.1.1-1.

#### 2.1.2 RCS Pressure SL

In MODES 1, 2, 3, 4, and 5, the RCS pressure shall be maintained  $\leq 2735$  psig.

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### 2.2 SL Violations

2.2.1 If SL 2.1.1 is violated, restore compliance and be in MODE 3 within 1 hour.

2.2.2 If SL 2.1.2 is violated:

2.2.2.1 In MODE 1 or 2, restore compliance and be in MODE 3 within 1 hour.

2.2.2.2 In MODE 3, 4, or 5, restore compliance within 5 minutes.

2.2.3 Within 1 hour notify the NRC Operations Center, in accordance with 10 CFR 50.72.

2.2.4 Within 24 hours, notify the Plant Manager and Vice President - Vogtle.

2.2.5 Within 30 days a Licensee Event Report (LER) shall be prepared and submitted to the NRC pursuant to 10 CFR 50.73.

2.2.6 Operation of the unit shall not be resumed until authorized by the NRC.

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## 5.0 ADMINISTRATIVE CONTROLS

### 5.1 Responsibility

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- 5.1.1 The Plant Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.
- The Vice President – Vogtle or his designee shall approve, prior to implementation, each proposed test, experiment, or modification to systems or equipment that affect nuclear safety.
- 5.1.2 A Senior Reactor Operator (SRO) shall be responsible for the control room command function while either unit is in MODES 1, 2, 3, or 4, or it is acceptable to designate an SRO as responsible for the control room command function for each unit. While both units are in MODE 5, 6, or defueled, an SRO or Reactor Operator (RO) shall be designated to assume the control room command function.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.2 Organization

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#### 5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR;
- b. The Plant Manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
- c. The Vice President - Vogtle shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

#### 5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A non-licensed operator shall be assigned to each reactor and an additional non-licensed operator shall be assigned for the control room when a reactor is operating in MODES 1,

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(continued)

5.2 Organization

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5.2.2 Unit Staff (continued)

event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time;
2. An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time;
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time;
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the applicable department manager or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual excess overtime shall be reviewed monthly by the Plant Manager or his designee to assure that excessive hours were authorized and that they do not become routine.

- f. The Operations Manager shall hold an SRO license.
- g. An individual shall be assigned who provides technical support in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall be available for duty when the plant is in modes 1-4. At other times, this individual is not required. In addition, this individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. This position may also be filled by the Shift Superintendent or

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(continued)

## 5.0 ADMINISTRATIVE CONTROLS

### 5.5 Programs and Manuals

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The following programs shall be established, implemented, and maintained.

#### 5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the Radioactive Effluent Controls and Radiological Environmental Monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports required by Specification 5.6.2 and Specification 5.6.3.

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
  1. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s),
  2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
- b. Shall become effective after the approval of the Vice President - Vogtle; and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page

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Enclosure 8

Vogtle Electric Generating Plant  
License Amendment Request to Revise Technical Specifications  
Southern Nuclear Operating Company Reorganization

Marked-up VEGP Technical Specifications Base Pages

**BASES**

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**SAFETY LIMIT  
VIOLATIONS**  
(continued)

2.2.1

If the reactor core SL 2.1.1 is violated, the requirement to go to MODE 3 places the unit in a MODE in which this SL is not applicable.

The allowed Completion Time of 1 hour recognizes the importance of bringing the unit to a MODE of operation where this SL is not applicable, and reduces the probability of fuel damage.

2.2.3

If the reactor core SL 2.1.1 is violated, the NRC Operations Center must be notified within 1 hour, in accordance with 10 CFR 50.72 (Ref. 5).

2.2.4

If the reactor core SL 2.1.1 is violated, the ~~Plant~~ General Manager - ~~Nuclear Plant~~ and the Vice President - ~~Vogtle Nuclear~~ shall be notified within 24 hours. This 24 hour period provides time for the plant operators and staff to take the appropriate immediate action and assess the condition of the unit before reporting to the senior management.

2.2.5

If the reactor core SL 2.1.1 is violated, a Licensee Event Report shall be prepared and submitted within 30 days to the NRC. This requirement is in accordance with 10 CFR 50.73 (Ref. 6).

2.2.6

If the reactor core SL 2.1.1 is violated, restart of the unit shall not commence until authorized by the NRC. This requirement ensures the NRC that all necessary reviews, analyses, and actions are completed before the unit begins its restart to normal operation.

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(continued)

BASES

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SAFETY LIMIT  
VIOLATIONS  
(continued)

2.2.2.2

If the RCS pressure SL 2.2.2 is exceeded in MODE 3, 4, or 5, RCS pressure must be restored to within the SL value within 5 minutes. Exceeding the RCS pressure SL in MODE 3, 4, or 5 is more severe than exceeding this SL in MODE 1 or 2, since the reactor vessel temperature may be lower and the vessel material, consequently, less ductile. As such, pressure must be reduced to less than the SL within 5 minutes. The action does not require reducing MODES, since this would require reducing temperature, which would compound the problem by adding thermal gradient stresses to the existing pressure stress.

2.2.3

If the RCS pressure SL is violated, the NRC Operations Center must be notified within 1 hour, in accordance with 10 CFR 50.72 (Ref. 6).

2.2.4

If the RCS pressure SL 2.2.2 is violated, the ~~Plant~~ General Manager - ~~Nuclear Plant~~ and the Vice President - ~~Vogtle Nuclear~~ shall be notified within 24 hours. The 24 hour period provides time for the plant operators and staff to take the appropriate immediate action and assess the condition of the unit before reporting to senior management.

2.2.5

If the RCS pressure SL 2.2.2 is violated, a Licensee Event Report shall be prepared and submitted within 30 days to the NRC. This requirement is in accordance with 10 CFR 50.73 (Ref. 7).

2.2.6

If the RCS pressure SL 2.2.2 is violated, restart of the unit shall not commence until authorized by the NRC. This requirement ensures the NRC that all necessary reviews,

(continued)