

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

**Southern Nuclear  
Operating Company, Inc.**  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201  
  
Tel 205.992.7721  
Fax 205.992.6165



*Energy to Serve Your World™*

NL-07-0653

April 11, 2007

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

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

Edwin I. Hatch Nuclear Plant  
Joseph M. Farley Nuclear Plant  
Vogtle Electric Generating Plant  
Southern Nuclear Operating Company Reorganization  
Response to Request for Additional Information

Ladies and Gentlemen:

Southern Nuclear Operating Company (SNC) is the licensed operator for the Joseph M. Farley Nuclear Plant (Farley), the Edwin I. Hatch Nuclear Plant (Hatch), and the Vogtle Electric Generating Station (Vogtle). By letter dated January 30, 2007, Southern Nuclear Operating Company submitted a license amendment request to change the Technical Specifications for Farley, Hatch, and Vogtle in accordance with the provisions of 10 CFR 50.90 to reflect the SNC change to a site vice president organizational structure. On February 14, 2007, the NRC provided a request for additional information regarding the SNC-proposed change. The response to the request for additional information is provided in Enclosure 1. Marked-up Technical Specification pages are provided in Enclosures 2, 4, and 6, for Farley, Hatch, and Vogtle, respectively. Clean-typed Technical Specification pages are provided in Enclosures 3, 5, and 7, for Farley, Hatch, and Vogtle, respectively.

The additional Technical Specification changes provide clarification for the requested change and do not impact the significant hazards determination provided in our January 30, 2007 request. Accordingly, the conclusions of the previously submitted significant hazards determination noticed at 72FR6790, dated February 13, 2007, remain valid.

This letter contains no NRC commitments. In accordance with the provisions of 10 CFR 50.91(b), copies of the original license amendment request have been provided to Dr. D. E. Williamson, Alabama State Health Officer, and Mr. N. Holcomb, Commissioner – Georgia Department of Natural Resources.

If you have any questions, please advise.

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.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Jeffrey T. Gasser

Sworn to and subscribed before me this 11<sup>th</sup> day of April, 2007.



Notary Public

My commission expires: 9/14/00

JTG/TWS/daj

- Enclosures:
1. Response to Request for Additional Information
  2. Marked-up Farley Technical Specifications Pages
  3. Clean Typed Farley Technical Specifications Pages
  4. Marked-up Hatch Technical Specifications Pages
  5. Clean Typed Hatch Technical Specifications Pages
  6. Marked-up Vogtle Technical Specifications Pages
  7. Clean Typed Vogtle Technical Specifications 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  
Mr. D. H. Jones, Vice President – Engineering  
RType: CFA04.054; CHA02.004; CVC7000; LC# 14559

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. E. L. Crowe, Senior Resident Inspector – Farley  
Mr. D. S. Simpkins, Senior Resident Inspector – Hatch  
Mr. G. J. McCoy, Senior Resident Inspector – Vogtle

Alabama Department of Public Health

Dr. D. E. Williamson, State Health Officer

Georgia Department of Natural Resources

Mr. N. Holcomb, Commissioner

Enclosure 1  
Joseph M. Farley Nuclear Plant  
Edwin I. Hatch Nuclear Plant  
Vogtle Electric Generating Plant  
Southern Nuclear Operating Company Reorganization

Response to Request for Additional Information

Enclosure 1  
Joseph M. Farley Nuclear Plant  
Edwin I. Hatch Nuclear Plant  
Vogtle Electric Generating Plant  
Southern Nuclear Operating Company Reorganization  
Response to Request for Additional Information

**NRC Question:**

In the amendment packages for all three sites, the site vice president position has been designated as the approval authority for:

1. Tests, experiments and modifications to systems or equipment that affect nuclear safety, and,
2. The Offsite Dose Calculation Manual (ODCM)

Standard Technical Specifications (STS) and the current SNC plant Technical Specifications (TS) assign the approval authority for these areas to the Plant Manager. Since the Plant Manager qualification is covered by each sites' TS 5.3.1/ANSI N18.1-1971 commitments and the site vice president position is not, please provide the qualification requirements for the site vice president position so the NRC staff can judge if the specified approval authority is acceptable.

**SNC Response:**

The qualifications for the generic title "plant manager" in ANSI N18.1-1971, Section 4.2.1, are understood by SNC to apply to the top ranking position that is a member of the onsite operating organization, as described in ANSI N18.1-1971, Section 3.2. Section 3.2.1 notes that the plant manager may be called plant superintendent, or other title. In the case of the SNC organization, the vice president is the top position of the onsite operating organization. Therefore, the qualification requirements for "plant manager" provided in ANSI N18.1-1971 apply to the vice president located at each SNC plant. Accordingly, the vice president located at each SNC plant will meet the qualification requirements of ANSI N18.1-1971 necessary to approve: (1) tests, experiments, and modifications to systems or equipment that affect nuclear safety; and (2) the ODCM.

SNC proposes to modify Technical Specification 5.3.1 for each site to define the vice president – plant and plant manager as members of the unit staff. Defining the vice president – plant and plant manager as members of the unit staff provides clarification that the minimum qualification requirements of ANSI N18.1-1971 also apply to the vice president – plant and plant manager. Enclosures 2, 4, and 6 provide marked-up Technical Specification pages for Farley, Hatch, and Vogtle, respectively, to reflect the proposed change to Technical Specification 5.3.1. Enclosures 3, 5, and 7 provide clean-typed Technical Specification pages for Farley, Hatch, and Vogtle, respectively, to reflect the proposed change to Technical Specification 5.3.1.

The proposed change to Technical Specification 5.3.1 for each plant provides clarification only and does not impact the significant hazards determination provided to the NRC by SNC letter dated January 30, 2007, and noticed at 72FR6790, dated February 13, 2007. Accordingly, the conclusions contained therein remain valid.

Enclosure 2  
Joseph M. Farley Nuclear Plant  
Southern Nuclear Operating Company Reorganization  
Response to Request for Additional Information

Farley Marked-up Technical Specification Pages

## 5.0 ADMINISTRATIVE CONTROLS

### 5.3 Unit Staff Qualifications

---

- 5.3.1 Each member of the unit staff, including Vice President – Farley and Plant Manager, shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions and the supplemental requirements specified in 10 CFR 55, except for (1) the senior individual in charge of Health Physics who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. 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.
-

Enclosure 3  
Joseph M. Farley Nuclear Plant  
Southern Nuclear Operating Company Reorganization  
Response to Request for Additional Information

Farley Clean-typed Technical Specification Pages

## 5.0 ADMINISTRATIVE CONTROLS

### 5.3 Unit Staff Qualifications

---

- 5.3.1 Each member of the unit staff, including Vice President – Farley and Plant Manager, shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions and the supplemental requirements specified in 10 CFR 55, except for (1) the senior individual in charge of Health Physics who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. 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.
-

Enclosure 4  
Edwin I. Hatch Nuclear Plant  
Southern Nuclear Operating Company Reorganization  
Response to Request for Additional Information

Hatch Marked-up Technical Specification Pages

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

---

- 5.3.1 Each member of the unit staff, including Vice President – Hatch and Plant Manager, 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.
-

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

---

---

- 5.3.1 Each member of the unit staff, including Vice President – Hatch and Plant Manager, 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.
- 
-

**Enclosure 5**  
**Edwin I. Hatch Nuclear Plant**  
**Southern Nuclear Operating Company Reorganization**  
**Response to Request for Additional Information**

**Hatch Clean-typed Technical Specification Pages**

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

---

5.3.1 Each member of the unit staff, including Vice President – Hatch and Plant Manager, 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.

---

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

---

5.3.1 Each member of the unit staff, including Vice President – Hatch and Plant Manager, 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.

---

**Enclosure 6**  
**Vogtle Electric Generating Plant**  
**Southern Nuclear Operating Company Reorganization**  
**Response to Request for Additional Information**

**Vogtle Marked-up Technical Specification Pages**

## 5.0 ADMINISTRATIVE CONTROLS

### 5.3 Unit Staff Qualifications

---

- 5.3.1 Each member of the unit staff, including Vice President – Vogtle and Plant Manager, shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, Revision 2, 1987, and, for licensed staff, 10 CFR 55.59. Prior to meeting the recommendations of Regulatory Guide 1.8, Revision 2, personnel may be trained to perform specific tasks and will be qualified to perform those tasks independently. 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.
-

Enclosure 7  
Vogtle Electric Generating Plant  
Southern Nuclear Operating Company Reorganization  
Response to Request for Additional Information

Vogtle Clean-typed Technical Specification Pages

## 5.0 ADMINISTRATIVE CONTROLS

### 5.3 Unit Staff Qualifications

---

- 5.3.1 Each member of the unit staff, including Vice President – Vogtle and Plant Manager, shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, Revision 2, 1987, and, for licensed staff, 10 CFR 55.59. Prior to meeting the recommendations of Regulatory Guide 1.8, Revision 2, personnel may be trained to perform specific tasks and will be qualified to perform those tasks independently. 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.
-