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October 18, 2007

Docket Nos.: 50-321  
50-366

NL-07-1925

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

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

Ladies and Gentlemen:

On October 30, 2006 Southern Nuclear Operating Company (SNC) submitted a proposed change to the Technical Specifications for Plant Hatch, Appendix A to the Operating Licenses, to allow staff positions to be filled by personnel who have completed an accredited program endorsed by the NRC. On June 28, 2007 the NRC requested additional information (RAI) regarding the proposed change. A teleconference was held on October 1, 2007 with the NRC staff regarding the RAI. Based on clarification provided by the NRC, it was decided that a rewording of the proposed change to the Technical Specifications would facilitate the review and approval of this request.

In accordance with the provisions of 10 CFR 50.90, SNC hereby submits a revision to the wording of the previously proposed change to the Edwin I. Hatch Nuclear Plant Unit 1 and Unit 2 Technical Specifications, Appendix A to operating licenses DPR-57 and NPF-5, respectively.

The proposed amendment would revise the training and qualifying education and experience eligibility requirements for certain unit staff positions to correspond to the process and requirements described in Enclosure 1 to this letter. The proposed changes will also provide additional flexibility by referencing the training programs listed in Enclosure 1 that describe how SNC would use an accredited program for certain unit staff positions. This request proposes to revise Administrative Controls Section 5.3.1 of the Plant Hatch Technical Specifications to (1) improve administrative flexibility and clarity in the wording of the specification and (2) replace a specific position title with a generic position title for the senior individual in charge of Health Physics. The proposed changes will reduce the regulatory burdens associated with the need to propose future revisions of Section 5.3.1 whenever a position title change is made. The proposed wording revision to Section 5.3.1 of the Technical Specifications incorporates references to this letter.

Enclosure 2 provides the basis for the proposed change. Enclosure 3 provides the marked-up Technical Specifications pages and Enclosure 4 provides the clean typed pages. There are no corresponding Bases pages associated with this Technical Specifications change.

SNC requests approval of the proposed changes on or before October 10, 2008, with the amendment being implemented within 90 days of approval.

Mr. L. M. Stinson states he is a Vice President of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and to the best of his knowledge and belief, the facts set forth in this letter are true.

This letter contains an NRC commitment. If you have any questions, please advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



L. M. Stinson  
Vice President Fleet Operations Support

Sworn to and subscribed before me this 18<sup>th</sup> day of October, 2007

  
Gail A. Hicks  
Notary Public

My commission expires: July 5, 2010

LMS/PAH/daj

- Enclosures:
1. Training Program Requirements
  2. Basis for Proposed Change
  3. Technical Specifications Marked-up Pages
  4. Technical Specifications Clean Typed Pages

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

U. S. Nuclear Regulatory Commission  
Dr. W. D. Travers, Regional Administrator  
Mr. R. E. Martin, NRR Project Manager – Hatch  
Mr. J. A. Hickey, Senior Resident Inspector – Hatch

State of Georgia  
Mr. L. C. Barrett, Commissioner – Department of Natural Resources

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

**Enclosure 1**

**Training Program Requirements**

## Enclosure 1

### Training Program Requirements

#### Table of Entry Level Requirements and Training Program Durations

This table represents Hatch entry level requirements and approximate durations of training programs. Program durations are typical and may vary depending on class makeup and experience level. Selection testing typically consists of standard tests such as Plant Operator Selection System (POSS), Power Plant Maintenance Positions Selection System (MASS), and/or Technical Occupations Selection System. ACAD documents refer to latest revision.

<b>Mechanic</b>	
Entry Requirements	H. S. Diploma or equivalent Meet requirements of selection testing
Training Program	Accredited program based on guidance in ACAD 92-008 Approximately 18 months of classroom, lab, & OJT, or equivalent
<b>Electrician</b>	
Entry Requirements	H. S. Diploma or equivalent Meet requirements of selection testing
Training Program	Accredited program based on guidance in ACAD 92-008 Approximately 18 months of classroom, lab, & OJT, or equivalent
<b>Instrument and Control Technician</b>	
Entry Requirements	H. S. Diploma or equivalent Minimum of two years of related education or training, or equivalent Meet requirements of selection testing
Training Program	Accredited program based on guidance in ACAD 92-008 Approximately 18 months of classroom, lab, & OJT, or equivalent
<b>First Line Maintenance Supervisor</b>	
Entry Requirements	H. S. Diploma or equivalent Minimum of 4 years of related technical experience, 2 years of which may be met by related education
Training Program	Accredited program based on guidance in ACAD 90-010 Maintenance Supervisor Training Program, or equivalent

**Enclosure 1**

**Training Program Requirements**

<b>Health Physics Technician</b>	
Entry Requirements	Minimum of 2 year technical degree in related field, or equivalent Meet requirements of selection testing
Training Program	Accredited program based on guidance in ACAD 93-008 Approximately 15 months of classroom, lab, & OJT, or equivalent
<b>Chemistry Technician</b>	
Entry Requirements	Minimum of 2 year technical degree in related field, or equivalent Meet requirements of selection testing
Training Program	Accredited program based on guidance in ACAD 97-012 Approximately 15 months of classroom, lab, & OJT, or equivalent
<b>Reactor Operator Senior Reactor Operator</b>	
Entry Requirements	Specified in ACAD 00-003
Training Program	Accredited program based on the requirements of ACAD 00-003 Approximately 18 months of classroom, simulator and OJT, or equivalent
<b>Engineer</b>	
Entry Requirements	4 year engineering degree or P.E. license
Training Program	Accredited program based on guidance in ACAD 98-004 Approximately 10-11 weeks of orientation training plus position specific training, or equivalent

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Section 5.3.1-Unit Staff Qualifications**

**Enclosure 2**

**Basis for Proposed Change**

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

**Enclosure 2**

**Basis for Proposed Change**

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	4.2 Applicable Regulatory Requirements/Criteria
	4.3 Precedent
	4.4 Conclusions
5.0	Environmental Consideration
6.0	References

## Enclosure 2

### Basis for Proposed Change

#### 1.0 Summary Description

This evaluation supports a request to amend Operating Licenses DPR-57 and NPF-5 for Plant Edwin I Hatch-Units 1 and 2.

The proposed changes would allow the use of National Academy (ACAD) training programs for certain plant positions as stipulated in Enclosure 1. The use of these training programs is to enable personnel to be qualified in a manner consistent with current industry practice. The title of Health Physics Manager would also be changed to senior individual in charge of Health Physics. It is requested that this request be approved by October 10, 2008.

#### 2.0 Detailed Description

##### HNP Unit 1 Proposed Change

TS Paragraph 5.3.1 - Each member of the unit staff, including Vice-President-Hatch and Plant Manager, shall either meet or exceed the minimum qualifications of ANSI N18.1-1971, or alternatively, for those positions as stipulated in Enclosure 1 to letter NL-07-1925 shall meet or exceed the minimum qualifications of the accredited program requirements. The senior individual in charge of Health Physics shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

##### HNP Unit 2 Proposed Change

TS Paragraph 5.3.1 - Each member of the unit staff, including Vice-President-Hatch and Plant Manager, shall either meet or exceed the minimum qualifications of ANSI N18.1-1971, or alternatively, for those positions as stipulated in Enclosure 1 to letter NL-07-1925 shall meet or exceed the minimum qualifications of the accredited program requirements. The senior individual in charge of Health Physics shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

#### 3.0 Technical Evaluation

The Edwin I. Hatch Nuclear Plant (HNP) 1 and HNP 2 Technical Specifications Administrative Controls Section 5.3.1 currently requires each member of the unit staff to meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Health Physics Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The specific position title reference to the "Health Physics Superintendent" is proposed to be changed to the "senior individual in charge of Health Physics." Additionally, it is proposed to add a statement to Section 5.3.1 that will reference letter NL-07-1925 to allow certain unit staff positions to be filled by personnel whose eligibility requirements correspond to those stipulated in Enclosure 1 to letter NL-07-1925. These eligible persons, through ACAD training, will have completed a training program that has been endorsed by the NRC.

The proposed changes will provide the flexibility to use accredited programs as stipulated in Enclosure 1 of letter NL-07-1925 for certain unit staff positions. The

## Enclosure 2

### Basis for Proposed Change

referenced programs are INPO guidelines. Accordingly, the proposed changes will not adversely impact the HNP organizational structure or personnel qualification program. The use of the program stipulated in Enclosure 1 will ensure the educational requirements and power plant experience for certain unit staff positions are satisfied. Accordingly, the overall level of qualification of the unit staff for these certain positions will not be reduced. Lines of authority for plant operations are also unaffected by the proposed changes.

The proposed changes to HNP 1 and HNP 2 Technical Specification Administrative Controls Section 5.3.1 are requested to reduce the regulatory burden of having to make future requests to revise Section 5.3.1 whenever a position title change is made. Removal of the specific title designation of Health Physics Superintendent and replacing it with a more generic reference to the "senior individual in charge of Health Physics" will reduce the regulatory burden of having to make future requests to revise Section 5.3.1 whenever a title change for this position is implemented. Additionally, the proposed change will not reduce the level of authority for this position. These changes will ensure that the senior individual in charge of Health Physics continues to meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

#### 4.0 Regulatory Evaluation

##### 4.1 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 (SNC) has evaluated whether or not a significant hazards consideration is involved with the proposed changes by focusing on the three standards set forth in 10 CFR 50.92 (c) as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change to Technical Specifications Administrative Controls Section 5.3.1 involves the use of a more generic designation for the unit staff position responsible for Health Physics without reducing the level of authority required for that position. The proposed change also allows the flexibility to use an accredited program for qualifying personnel to fill certain unit staff positions as stipulated in

## **Enclosure 2**

### **Basis for Proposed Change**

Enclosure 1, which represents an acceptable alternative to the qualification requirements for these positions as currently specified in the Technical Specifications. Since the proposed changes are administrative in nature, they do not involve any physical changes to any structures, systems, or components, nor will their performance requirements be altered. The proposed changes also do not affect the operation, maintenance, or testing of the plant. Therefore, the response of the plant to previously analyzed accidents will not be affected. Consequently, the proposed changes do not involve a significant increase 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?

Response: No

The proposed changes to the Technical Specifications will have no adverse impact on the overall qualification of the unit staff. The use of a more generic designation for the unit staff position responsible for Health Physics and the proposed addition a statement to Section 5.3.1 that will reference this letter and the accreditation information for the positions stipulated in Enclosure 1 will allow the use of an accredited program that has been endorsed by the NRC and will ensure the educational requirements and power plant experience for each unit staff position are properly satisfied and will continue to fulfill applicable regulatory requirements. Also, since no change is being made to the design, operation, maintenance, or testing of the plant, no new methods of operation or failure modes are introduced by the proposed changes. Therefore, the possibility of a new or different kind of accident from any previously evaluated is not created.

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

Response: No

The proposed changes to the Technical Specifications will have no adverse impact on the onsite organizational features necessary to assure safe operation of the plant. Lines of authority for plant operation are unaffected by the proposed changes. Also, the adoption of the more generic designation of the individual responsible for Health Physics will reduce the regulatory burden of having to devote limited resources to process a license amendment whenever a title change for this position is implemented. Accordingly, this reduction in regulatory burden and the proposed addition of a statement to Section 5.3.1 that will reference this letter and the use of accreditation information provided in Enclosure 1, will allow the use of an accredited program endorsed by NRC to qualify certain unit staff positions and will improve organizational flexibility without compromising plant safety. Therefore, the proposed changes do not involve a significant decrease in the margin of safety.

## **Enclosure 2**

### **Basis for Proposed Change**

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

#### **4.2 Applicable Regulatory Requirements/Criteria**

10 CFR 50.120 requires a systematic approach to training (SAT) which includes a requirement for the training program to be periodically evaluated and revised as appropriate to reflect industry experience as well as changes to the facility, procedures, regulations, and quality assurance requirements. The training program must be periodically reviewed by licensee management for effectiveness. The use of INPO ACADs is an acceptable approach to maintain training that reflects industry experience.

#### **4.3 Precedent:**

A similar amendment was approved for Wolf Creek Generating Station on January 31, 2005 (TAC No. MC4795, ML050340189).

#### **4.4 Conclusions**

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

#### **5.0 Environmental Assessment**

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:

- 1.0 Involve a significant hazards consideration
- 2.0 Result in a significant change in the types, or a significant increase in the amounts, of any effluents that may be released offsite, or
- 3.0 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 hazard consideration, (2) a significant change in the types or significant increase in the amounts of any effluents that may be released off-site, or (3) a significant increase in the individual or cumulative occupational exposure. Accordingly, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9), and an environmental assessment of the proposed changes is not required.

## **Enclosure 2**

### **Basis for Proposed Change**

#### **References:**

- 1.0 Wolf Creek Nuclear Generating Station approved on January 31, 2005  
(TAC No. MC4795, ML050340189)

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Section 5.3.1-Unit Staff Qualifications**

**Enclosure 3**

**Marked-up Technical Specifications Pages**

. or shall meet or exceed the minimum qualifications of the accredited program requirements for those positions stipulated in Enclosure 1 to letter NL-07-1925.

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

either

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.

The senior individual in charge of Health Physics

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Unit Staff Qualifications  
5.3

## 5.0 ADMINISTRATIVE CONTROLS

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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.

The senior individual in charge of Health Physics

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**Enclosure 4**

**Clean Typed Technical Specifications Pages**

5.0 ADMINISTRATIVE CONTROLS

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- 5.3.1 Each member of the unit staff, including Vice President – Hatch and Plant Manager, shall either meet or exceed the minimum qualifications of ANSI N18.1-1971, or shall meet or exceed the minimum qualifications of the accredited program requirements for those positions stipulated in Enclosure 1 to letter NL-07-1925. The senior individual in charge of Health Physics shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.3 Unit Staff Qualifications

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- 5.3.1 Each member of the unit staff, including Vice President – Hatch and Plant Manager, shall either meet or exceed the minimum qualifications of ANSI N18.1-1971, or shall meet or exceed the minimum qualifications of the accredited program requirements for those positions stipulated in Enclosure 1 to letter NL-07-1925. The senior individual in charge of Health Physics shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.
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