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SOUTHERN COMPANY
Energy to Serve Your World

May 19, 2009

NL-09-0172

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
License Amendment Request for Adoption of TSTF-511, Rev. 0,
Eliminate Working Hour Restrictions from TS 5.2.2
to Support Compliance with 10 CFR Part 26

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90 of Title 10 of the Code of Federal Regulations (10 CFR), Southern Nuclear Operating Company (SNC) is submitting a request for an amendment to the Technical Specifications (TS) for the Edwin I. Hatch Nuclear Plant (HNP), Joseph M. Farley Nuclear Plant (FNP), and Vogtle Electric Generating Plant (VEGP).

The proposed amendment would delete those portions of TS superseded by 10 CFR Part 26, Subpart I. This change is consistent with NRC approved Revision 0 to Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF-511, "Eliminate Working Hour Restrictions from TS 5.2.2 to Support Compliance with 10 CFR Part 26." The availability of this TS improvement was announced in the Federal Register on December 30, 2008 (73 FR 79923) as part of the consolidated line item improvement process (CLIIP).

Enclosure 1 provides a description of the proposed change to the HNP, FNP, and VEGP TS, the requested confirmation of plant-specific applicability, verifications, and variations. Enclosures 2, 4, and 6 provide the existing TS pages marked up to show the proposed changes for HNP, FNP, and VEGP, respectively. Enclosures 3, 5, and 7 provide revised (clean) TS pages for HNP, FNP, and VEGP, respectively. Enclosure 8 provides the commitments associated with this letter.

SNC requests approval of the proposed license amendment by August 15, 2009, to support implementation of the TS changes concurrent with SNC implementation of the new 10 CFR 26, Subpart I requirements.

In accordance with 10 CFR 50.91, a copy of this application, with enclosures, is being provided to the appropriate designated Alabama and Georgia officials.

If you should have any questions regarding this submittal, please contact me.

Mr. M. J. Ajluni states he is Nuclear Licensing Manager 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.

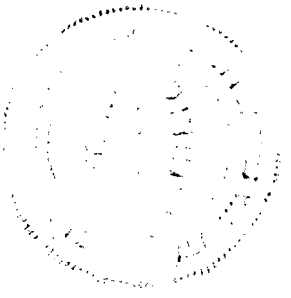
The NRC commitments contained in this letter are provided as a table in Enclosure 8.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

Mark J Ajluni

M. J. Ajluni
Manager, Nuclear Licensing



Sworn to and subscribed before me this 19th *day of* May, *2009.*

Patricia H. Raymond
Notary Public

My commission expires: 7-21-2012

MJA/TWS/daj

Enclosures:
1. Basis for Proposed Change
2. Markup for HNP Proposed TS Change
3. Clean Typed Pages for HNP Proposed TS Change
4. Markup for FNP Proposed TS Change
5. Clean Typed Pages for FNP Proposed TS Change
6. Markup for VEGP Proposed TS Change
7. Clean Typed Pages for VEGP Proposed TS Change
8. NRC Commitments

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President
Mr. J. R. Johnson, Vice President – Farley
Mr. D. R. Madison, Vice President – Hatch
Mr. T. E. Tynan, Vice President – Vogtle
Ms. P. M. Marino, Vice President – Engineering
RType: CFA04.054; CHA02.004; CVC7000

U. S. Nuclear Regulatory Commission
Mr. L. A. Reyes, Regional Administrator
Mr. R. E. Martin, NRR Project Manager – Farley
Ms. D. N. Wright, NRR Project Manager – Hatch
Ms. D. N. Wright, NRR Project Manager – Vogtle
Mr. E. L. Crowe, Senior Resident Inspector – Farley
Mr. J. A. Hickey, Senior Resident Inspector – Hatch
Mr. M. Cain, Senior Resident Inspector – Vogtle

Alabama Department of Public Health
Dr. D. E. Williamson, State Health Officer

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

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Enclosure 1

Basis for Proposed Change

Enclosure 1

Basis for Proposed Change

Table of Contents

Enclosure 1

Basis for Proposed Change

1.0 Description

On April 17, 2007, the NRC Commissioners approved a final rule amending Title 10, Part 26, of the Code of Federal Regulations (CFR) which, among other changes, established requirements for managing worker fatigue by designating individual break requirements, work hour limits, and annual reporting requirements. Subpart I was published in the Federal Register on March 31, 2008, with a required implementation period of 18 months. Compliance is, therefore, required by October 1, 2009. Prior to publication of 10 CFR Part 26, controls on worker fatigue were incorporated in plant-specific Technical Specifications (TS). With the publication of 10 CFR Part 26, these plant-specific controls are no longer needed.

The proposed change, applicable to the Edwin I. Hatch Nuclear Plant (HNP), Joseph M. Farley Nuclear Plant (FNP), and Vogtle Electric Generating Plant (VEGP), modifies Administrative Controls TS 5.2.2, to delete paragraph e associated with work hour restrictions. The proposed change is consistent, except as noted in Section 2.2 below, with Nuclear Regulatory Commission (NRC) approved Technical Specification Task Force (TSTF) Standard Technical Specification (STS) change TSTF-511, Revision 0, "Eliminate Working Hour Restrictions from TS 5.2.2 to Support Compliance with 10 CFR Part 26." The availability of this TS improvement was published in the Federal Register on December 30, 2008 (73 FR 79923) as part of the consolidated line item improvement process (CLIIP).

2.0 Assessment

2.1 Applicability of Published Safety Evaluation

Southern Nuclear Operating Company (SNC) has reviewed the safety evaluation dated December 30, 2008 as part of the CLIIP. This review included a review of the NRC staff's Safety Evaluation, as well as the supporting information provided to support TSTF-511. SNC has concluded that the justifications presented in the TSTF and the Safety Evaluation prepared by the NRC staff are applicable to Units 1 and 2 of HNP, FNP, and VEGP and justify this amendment for the incorporation of changes to the TS for Units 1 and 2 of HNP, FNP, and VEGP.

Based on this review, SNC has identified one deviation from the TSTF and corresponding NRC model SER, as it applies to the HNP, FNP, and VEGP TS. Specifically, TSTF-511, Revision 0, identifies the affected paragraph to be paragraph d of TS section 5.2.2. The affected section for HNP, FNP, and VEGP is paragraph e of TS section 5.2.2. With the exception of this deviation, the remainder of the TSTF and corresponding NRC model SER, including the conclusions contained therein, are applicable to the proposed TS change.

2.2 Optional Changes and Variations

SNC is not proposing changes or deviations from the TS changes described in TSTF-511, Revision 0, except as noted below:

1. The affected TS paragraph applicable to HNP, FNP, and VEGP is TS 5.2.2(e) as opposed to TS 5.2.2(d) described in TSTF-511, Revision 0, and the NRC model SER.
2. In lieu of renumbering the remaining sections in TS 5.2.2, SNC proposes to annotate TS 5.2.2(e) to indicate that it has been deleted without renumbering the remaining TS 5.2.2 sections (i.e., TS 5.2.2(f) and 5.2.2(g)).

2.3 Licensing Commitment to implement 10 CFR Part 26, Subpart I, Concurrent with Elimination of TS 5.2.2(e)

SNC will implement the requirements of 10 CFR Part 26, Subpart I, concurrent with elimination of TS 5.2.2(e) as described in Enclosure 8 of this submittal.

3.0 Regulatory Analysis

3.1 No Significant Hazards Consideration Determination

SNC has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register as part of the CLIIP. SNC has concluded that the proposed NSHCD presented in the Federal Register notice is applicable to Units 1 and 2 of HNP, FNP, and VEGP and the evaluation is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a) for this application.

4.0 Environmental Evaluation

SNC has reviewed the environmental evaluation included in the model safety evaluation dated December 30, 2008 as part of the CLIIP. SNC has concluded that the staff's findings presented in the published evaluation are applicable to Units 1 and 2 of HNP, FNP, and VEGP and the evaluation is hereby incorporated by reference for this application.

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Enclosure 2

Markup for HNP Proposed TS Change

5.2 Organization

5.2.2 Unit Staff (continued)

b. At least one licensed Reactor Operator (RO) shall be present in the control room for each unit that contains fuel in the reactor. In addition, while the unit is in MODE 1, 2, or 3, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.

c. The minimum shift crew composition shall be in accordance with 10 CFR 50.54(m)(2)(i). Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. An individual qualified to implement radiation protection procedures shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

Deleted

e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed and non-licensed operations personnel, health physics technicians, key maintenance personnel, etc.).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a nominal 40 hour week while the unit is operating. However, in the 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.

(continued)

5.2 Organization

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 or at least one Operations Superintendent shall hold an 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.

5.2 Organization

5.2.2 Unit Staff (continued)

b. At least one licensed Reactor Operator (RO) shall be present in the control room for each unit that contains fuel in the reactor. In addition, while the unit is in MODE 1, 2, or 3, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.

c. The minimum shift crew composition shall be in accordance with 10 CFR 50.54(m)(2)(i). Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. An individual qualified to implement radiation protection procedures shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

Deleted

e. ~~Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed and non-licensed operations personnel, health physics technicians, key maintenance personnel, etc.).~~

~~Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a nominal 40 hour week while the unit is operating. However, in the 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.~~

(continued)

5.2 Organization

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 or at least one Operations Superintendent shall hold an 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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Enclosure 3

Clean Typed Pages for HNP Proposed TS Change

5.2 Organization

5.2.2 Unit Staff (continued)

b. At least one licensed Reactor Operator (RO) shall be present in the control room for each unit that contains fuel in the reactor. In addition, while the unit is in MODE 1, 2, or 3, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.

c. The minimum shift crew composition shall be in accordance with 10 CFR 50.54(m)(2)(i). Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. An individual qualified to implement radiation protection procedures shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. Deleted.

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

f. The Operations Manager or at least one Operations Superintendent shall hold an 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.

5.2 Organization

5.2.2 Unit Staff (continued)

b. At least one licensed Reactor Operator (RO) shall be present in the control room for each unit that contains fuel in the reactor. In addition, while the unit is in MODE 1, 2, or 3, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.

c. The minimum shift crew composition shall be in accordance with 10 CFR 50.54(m)(2)(i). Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. An individual qualified to implement radiation protection procedures shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. Deleted.

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

f. The Operations Manager or at least one Operations Superintendent shall hold an 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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Enclosure 4

Markup for FNP Proposed TS Change

5.2 Organization

5.2.2 Unit Staff (continued)

b. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room. A single SRO may fill this position for both units.

c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. A Health Physics Technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

Deleted

e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed SROs, licensed ROs, health physicists, auxiliary operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a nominal 40 hour week while the unit is operating. However, in the 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;

(continued)

5.2 Organization

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 Operations Manager or at least one Operations Superintendent 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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Enclosure 5

Clean Typed Pages for FNP Proposed TS Change

5.2 Organization

5.2.2 Unit Staff (continued)

b. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room. A single SRO may fill this position for both units.

c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. A Health Physics Technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. Deleted.

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

f. The Operations Manager or at least one Operations Superintendent 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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Enclosure 6

Markup for VEGP Proposed TS Change

5.2.2 Unit Staff (continued)

2, 3, or 4. With both units in MODES 5 or 6 or defueled, a total of three non-licensed operators are required for the two units.

b. At least one licensed RO shall be present in the control room when fuel is in the reactor.

----------NOTE----------
A single SRO licensed on both units may fulfill this function for both units.

In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed SRO shall be present in the control room.

c. The shift crew composition may be less than the minimum requirement of 10 CFR 50.54 (m)(2)(i) and 5.2.2.a and g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. ----------NOTE----------
A single Health Physics Technician may fulfill this position for both units.

A Health Physics Technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

Deleted

e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed SROs, licensed ROs, key health physics technicians, key non-licensed operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work an 8 or 12 hour day, nominal 40 hour week while the unit is operating. However, in the

(continued)

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 or at least one Operations Superintendent 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)

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Enclosure 7

Clean Typed Pages for VEGP Proposed TS Change

5.2.2 Unit Staff (continued)

2, 3, or 4. With both units in MODES 5 or 6 or defueled, a total of three non-licensed operators are required for the two units.

b. At least one licensed RO shall be present in the control room when fuel is in the reactor.

----------NOTE----------
A single SRO licensed on both units may fulfill this function for both units.

In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed SRO shall be present in the control room.

c. The shift crew composition may be less than the minimum requirement of 10 CFR 50.54 (m)(2)(i) and 5.2.2.a and g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. ----------NOTE----------
A single Health Physics Technician may fulfill this position for both units.

A Health Physics Technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. Deleted.

(continued)

5.2.2 Unit Staff (continued)

f. The Operations Manager or at least one Operations Superintendent 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 the individual with an SRO license provided that person meets the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

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Enclosure 8

NRC Commitments

NRC Commitments
List of Regulatory Commitments

The following table identifies the regulatory commitments in this document. Any other statements in this submittal represent intended or planned actions. They are provided for information purposes and are not considered to be regulatory commitments.

REGULATORY COMMITMENTS	DUE DATE / EVENT
1. SNC will implement the requirements of 10 CFR Part 26, Subpart I, concurrent with elimination of TS 5.2.2(e).	Concurrent with elimination of TS 5.2.2(e)