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May 27, 2011

Docket Nos.: 50-366

NL-11-0816

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

Edwin I. Hatch Nuclear Plant Unit 2
Supplement to Licensing Amendment Request for Adoption of TSTF – 425 – A,
Rev. 3, Risk – Informed Justification for the Relocation of Specific Frequency
Requirements to a Licensee Controlled Program
Using the Consolidated Line Item Improvement Process

Ladies and Gentlemen:

By letter dated October 29, 2010, supplemented by letter dated February 21, 2011, Southern Nuclear Operating Company (SNC) submitted a license amendment request to relocate specific surveillance frequencies listed in the Technical Specifications (TS) for Unit 1 and Unit 2 of Edwin I. Hatch Nuclear Plant (HNP) with the implementation of Nuclear Energy Institute (NEI) 04-10, Revision 1 "Risk – Informed Technical Specification Initiative 5b, Risk – Informed Method of Control of Surveillance Frequencies." This request also included a proposal to delete the definition of STAGGERED TEST BASIS from section 1.1 of the HNP Unit 2 TS and relocate the definition to a licensee controlled document. However, the proposal did not include relocating NOTE 3 of Surveillance Requirement (SR) 3.3.1.1.16 (Unit 2 only). SR 3.3.1.1.16 requires verification of the Reactor Protection System (RPS) Instrumentation response time for HNP Unit 2 and includes 3 notes described below:

- "NOTE 1. Neutron detectors are excluded" – Allows neutron detectors to be excluded from RPS response time testing because the principles of detector operation virtually ensure an instantaneous response time.
- "NOTE 2. (Not used)" – Currently not being used.
- "NOTE 3. For Function 5, "n" equals 4 channels for the purpose of determining the STAGGERED TEST BASIS Frequency" – Requires STAGGERED TEST BASIS Frequency to be determined based on four channels per trip system, in lieu of the eight channels specified in HNP Unit 2 TS Table 3.3.1.1-1 for the Main Steam Line Isolation Valve - Closure Function.

In accordance with the provisions of 10 CFR 50.90 of Title 10 of the Code of Federal Regulations (10 CFR), SNC is proposing to relocate NOTE 3, along with the frequency for SR 3.3.1.1.16, to the licensee controlled document that is defined in Technical Specification Task Force (TSTF) 425-A, Revision 3 and delete unused Note 2 from the HNP Unit 2 Technical Specifications.

Enclosure 1 contains the HNP Unit 2 Marked – Up TS Pages. Enclosure 2 contains the Clean Typed Pages for HNP Unit 2 TSs. Enclosure 3 contains the Marked – Up HNP Unit 2 TS Bases Page for reference only.

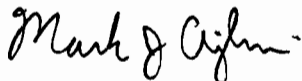
The Basis of Proposed Change, including the No Significant Hazards Consideration and the Environmental Evaluation, and the Documentation of PRA Technical Adequacy submitted to the NRC in SNC letter dated October 29, 2010 are applicable to the additional TS changes described in this supplemental letter.

In accordance with 10 CFR 50.91, "Notice for Public Comment; State Consultation," a copy of this application, with enclosures, is being provided to the appropriate designated Georgia Officials.

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

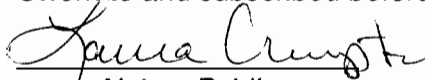
This letter contains no NRC commitments. If you have any questions, please contact Jack Stringfellow at (205) 992-7037.

Respectfully submitted,



M. J. Ajluni
Nuclear Licensing Director

Sworn to and subscribed before me this 27th day of May, 2011.


Paula Crumpton
Notary Public

My commission expires: 11-02-2013

MJA/SYA/

U. S. Nuclear Regulatory Commission

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Enclosures: 1. HNP Unit 2 Marked – Up Technical Specification Pages
 2. HNP Unit 2 Clean Typed Technical Specification Pages
 3. HNP Unit 2 Marked – Up Technical Specification Bases
 Pages (Reference only)

cc: Southern Nuclear Operating Company
 Mr. J. T. Gasser, Executive Vice President
 Mr. D. R. Madison, Vice President – Hatch
 Ms. P. M. Marino, Vice President – Engineering
 RType: CHA02.004

U. S. Nuclear Regulatory Commission
 Mr. V.M. McCree, Regional Administrator
 Mr. R. E. Martin, NRR Project Manager – Hatch
 Mr. E. D. Morris, Senior Resident Inspector – Hatch
 Mr. P.G. Boyle, NRR Project Manager

State of Georgia
 Mr. Allen Barnes, Environmental Director Protection Division

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Enclosure 1

HNP Unit 2 Marked – Up Technical Specification Pages

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.1.1.11	Verify Turbine Stop Valve - Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure - Low Functions are not bypassed when THERMAL POWER is $\geq 27.6\%$ RTP.	24 months
SR 3.3.1.1.12	Perform CHANNEL FUNCTIONAL TEST.	24 months
SR 3.3.1.1.13	<p>-----NOTES-----</p> <p>1. Neutron detectors are excluded.</p> <p>2. For Function 1, not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2.</p> <p>-----</p> <p>Perform CHANNEL CALIBRATION.</p>	24 months
SR 3.3.1.1.14	(Not used.)	
SR 3.3.1.1.15	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months
SR 3.3.1.1.16	<p>-----NOTES-----</p> <p>1. Neutron detectors are excluded.</p> <p>2. (Not used.)</p> <p>3. For Function 5, "n" equals 4 channels for the purpose of determining the STAGGERED TEST BASIS Frequency.</p> <p>-----</p> <p>Verify the RPS RESPONSE TIME is within limits.</p>	<p>24 months on a STAGGERED TEST BASIS</p>

Delete

3. For Function 5, "n" equals 4 channels for the purpose of determining the STAGGERED TEST BASIS Frequency.

24 months on a STAGGERED TEST BASIS

Insert:
In accordance with the Surveillance Frequency Control Program

(continued)

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Enclosure 2

HNP Unit 2 Clean Typed Technical Specification Pages

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.1.1.11	Verify Turbine Stop Valve - Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure - Low Functions are not bypassed when THERMAL POWER is $\geq 27.6\%$ RTP.	24 months
SR 3.3.1.1.12	Perform CHANNEL FUNCTIONAL TEST.	24 months
SR 3.3.1.1.13	<p>-----NOTES-----</p> <ol style="list-style-type: none"> 1. Neutron detectors are excluded. 2. For Function 1, not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2. <p>-----</p> <p>Perform CHANNEL CALIBRATION.</p>	24 months
SR 3.3.1.1.14	(Not used.)	
SR 3.3.1.1.15	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months
SR 3.3.1.1.16	<p>-----NOTE-----</p> <p>Neutron detectors are excluded.</p> <p>-----</p> <p>Verify the RPS RESPONSE TIME is within limits.</p>	In accordance with the Surveillance Frequency Control Program

(continued)

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Enclosure 3

HNP Unit 2 Marked – Up Technical Specification Bases Pages (Reference only)

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.3.1.1.16 (continued)

analysis. This test may be performed in one measurement or in overlapping segments, with verification that all components are tested. The RPS RESPONSE TIME acceptance criteria are included in Reference 10.

RPS RESPONSE TIME for APRM two-out-of-four Voter Function 2.e includes the output relays of the voter and the associated RPS relays and contactors. (The digital portions of the APRM and two-out-of-four voter channels are excluded from RPS RESPONSE TIME testing because self-testing and calibration check the time base of the digital electronics.) Confirmation of the time base is adequate to assure required response times are met. Neutron detectors are excluded from RPS RESPONSE TIME testing because the principles of detector operation virtually ensure an instantaneous response time.

The SR 3.3.1.1.16 Note 4 allows neutron detectors to be excluded from RPS RESPONSE TIME testing because the principles of detector operation virtually ensure an instantaneous response time.

RPS RESPONSE TIME tests are conducted in accordance with the Surveillance Frequency Control Program on an 24 month STAGGERED TEST BASIS. ~~Note 3 requires STAGGERED TEST BASIS Frequency to be determined based on four channels per trip system, in lieu of the eight channels specified in Table 3.3.1.1-1 for the Main Steam Line Isolation Valve Closure Function. This Frequency is based on the logic interrelationships of the various channels required to produce an RPS scram signal. This Frequency is consistent with the typical industry refueling cycle and is based upon plant operating experience, which shows that random failures of instrumentation components causing serious response time degradation, but not channel failure, are infrequent occurrences. The 24 month Frequency, on a STAGGERED TEST BASIS, is also based on a review of the surveillance test history and Reference 20.~~

Note: SR 3.3.1.1.16 for Function 2.e confirms the response time of that function, and also confirms the response time of loop components common to APRM - Two Out of Four Voter logic and other RPS loops.

SR 3.3.1.1.17

This SR ensures that scrams initiated from OPRM Upscale Function 2.f will not be inadvertently bypassed when THERMAL POWER, as indicated by APRM Simulated Thermal Power, is $\geq 25\%$ RTP and core flow, as indicated by recirculation drive flow, is $< 60\%$ rated core flow. This normally involves confirming the bypass

(continued)