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December 29, 2011



Docket Nos.: 50-321 50-366 NL-11-2388

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

Edwin I. Hatch Nuclear Plant, Units 1 and 2 Response to Request for Additional Information Regarding 60 Day Response to Bulletin 2011-01, "Mitigating Strategies" (TAC NOS. ME6438 and ME6439)

Ladies and Gentlemen:

By letters dated June 10, 2011 (ADAMS Accession No. ML111610583) and July 7, 2011 (ADAMS Accession No. ML111610583) Southern Nuclear Operating Company (SNC) submitted a 30 day response and a 60 day response respectively to Nuclear Regulatory Commission (NRC) Bulletin 2011-01, Mitigating Strategies. Subsequently, by letter dated November 15, 2011 the NRC submitted a request for additional information (RAI) to the July 7, 2011 letter submitted by SNC. The responses to the NRC RAI's are provided in the Enclosure.

Mr. M. J. Ajluni states he is the Nuclear Licensing Director of Southern Nuclear Operating Company, and 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 Doug McKinney at (205) 992-5982.

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Respectfully submitted,

Mark & ajhini

M. J. Ajluni Nuclear Licensing Director

Sworn to and subscribed before me this 29 day of (ner , 2011. My commission expires:

MJA/LBH/lac

Enclosure: Edwin I. Hatch Response to Request for Additional Information Regarding 60 Day Response to Bulletin 2011-01, "Mitigating Strategies"

 cc: <u>Southern Nuclear Operating Company</u> Mr. S. E. Kuczynski, Chairman, President & CEO Mr. D. G. Bost, Chief Nuclear Officer Mr. D. R. Madison, Vice President – Hatch Mr. B. L. Ivey, Vice President – Regulatory Affairs Ms. P. M. Marino, Vice President – Engineering Mr. B. J. Adams, Vice President – Fleet Operations

RType: CHA02.004

<u>U. S. Nuclear Regulatory Commission</u> Mr. V. M. McCree, Regional Administrator Mr. W. C. Gleaves, NRR Senior Project Manager – Hatch Mr. E. D. Morris, Senior Resident Inspector – Hatch

<u>State of Georgia</u> Mr. Allen Barnes, Environmental Director Protection Division

Edwin I. Hatch Nuclear Plant, Units 1 and 2

Enclosure

Edwin I. Hatch Response to Request for Additional Information Regarding 60 Day Response to Bulletin 2011-01, "Mitigating Strategies"

Edwin I. Hatch Response to Request for Additional Information Regarding 60 Day Response to Bulletin 2011-01, "Mitigating Strategies"

<u>RAI 1</u>

Describe in detail the maintenance or testing of monitor nozzles, spray nozzles, or similar devices to ensure that they will be functional when needed.

The bulletin requested that each licensee describe in detail the maintenance and testing on equipment procured to support the mitigating strategies to ensure that it will be functional when needed. In the context of the mitigating strategies, these devices are commonly used for firefighting, spent fuel pool spray strategies, and as a means to reduce the magnitude of fission product releases. Your response states that you annually inspect portable hose monitors and fire equipment, but it is not clear if these inspections will ensure that the devices listed above will be functional when needed.

SNC Response

The portable hoses, hose monitors and fire equipment including nozzles are inspected annually by a System Operator who is familiar with this type of equipment and the dedicated hoses are tested annually. There is reasonable assurance that the operator would identify and report any nozzle or equipment defects that could affect their functionality. The hoses and tools are staged in covered buildings or inside the powerblock and are not used for other activities. This provides an additional level of confidence in the ongoing condition and functionality of the equipment. Additional inspection instruction enhancements were recently made to provide more specific inspection criteria for the monitor nozzle, spray nozzles or similar devices, e.g., checking gaskets, proper operation of moving parts, check for damage to nozzle/threads, etc., to further ensure they will be functional when needed.

<u>RAI 2</u>

Describe in detail how you ensure that a vehicle is available to move the B.5.b portable pump and other B.5.b equipment to the appropriate place when needed.

The bulletin requested that each licensee describe in detail the controls for assuring equipment needed to execute the mitigating strategies will be available when needed. A vehicle is typically needed to implement the strategies since the portable pump and other equipment is stored away from target areas. The NRC staff could not determine if you performed activities to ensure that a tow vehicle would be available when needed.

SNC Response

Hatch maintains a tow vehicle that is available to move the B.5.b portable pump trailer and other B.5.b equipment to the appropriate location(s) when needed. This vehicle is under the control of Operations and used for routine activities onsite and is typically located outside of the target areas. The hitch needed for towing is located and maintained in the B.5.b storage location. Additionally,

Edwin I. Hatch Response to Request for Additional Information Regarding 60 Day Response to Bulletin 2011-01, "Mitigating Strategies"

multiple other vehicles located outside the target area are available and controlled that can receive the hitch for towing of the B.5.b trailer and equipment. Additionally, a fire equipment trailer must also be towed as part of B.5.b strategies and two vehicles are designated for that purpose in the form of a security or fire training vehicle. To ensure the vehicles mentioned are capable of responding, preventive maintenance is performed periodically and as recommended by the vehicle manufacturer. Vehicle maintenance is conducted within the Owner Controlled Area by Georgia Power Company Fleet Services.