

**Dennis R. Madison**  
Vice President - Hatch

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April 19, 2013

Docket Nos.: 50-366

NL-13-0742

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

Edwin I. Hatch Nuclear Plant  
Licensee Event Report 2013-02  
Performance of Operations With Potential For Draining the Reactor Vessel  
(OPDRV) Under Specific NRC Interim Actions

Ladies and Gentlemen:

In accordance with the requirements of 10CFR50.73(a)(2)(i)(B), Southern Nuclear Operating Company hereby submits the enclosed Licensee Event Report (LER) concerning performance of operations with the potential for draining the reactor vessel (OPDRVs) while in Mode 5 without secondary containment being operable, which is a condition prohibited by the Technical Specifications. The provisions contained in NRC enforcement guidance memorandum (EGM) 11-003, Revision 1, "Dispositioning Boiling Water Reactor Licensee Noncompliance with Technical Specification Containment Requirements During Operations with a Potential for Draining the Reactor Vessel", were satisfied during performance of the OPDRVs reported in the enclosed LER.

This letter contains no NRC commitments. If you have any questions, please contact Doug McKinney at (205) 992-5982.

Respectfully submitted,

A handwritten signature in black ink that reads "Dennis R. Madison".

D. R. Madison  
Vice President – Hatch

DRM/sb/sb

Enclosures: LER 2-2013-02

cc: Southern Nuclear Operating Company  
Mr. S. E. Kuczynski, Chairman, President & CEO  
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer  
Mr. B. L. Ivey, Vice President – Regulatory Affairs  
Mr. B. J. Adams, Vice President – Fleet Operations  
M. A. Dowd – Operating Experience Coordinator  
RTYPE: CHA02.004

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

NL-13-0742

Licensee Event Report 2-2013-002

Performance of Operations With Potential For Draining the Reactor Vessel  
(OPDRV) Under Specific NRC Interim Actions

# LICENSEE EVENT REPORT (LER)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to [infocollects.resources@nrc.gov](mailto:infocollects.resources@nrc.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

<b>1. FACILITY NAME</b> Edwin I. Hatch Nuclear Plant Unit 2	<b>2. DOCKET NUMBER</b> 05000 366	<b>3. PAGE</b> 1 OF 3
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**4. TITLE**  
Performance of Operations With Potential For Draining the Reactor Vessel (OPDRV) Without Operable Secondary Containment

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
02	19	2013	2013	- 002 -	00	04	19	2013		05000
										05000

<b>9. OPERATING MODE</b>  Mode 5	<b>11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR§:</b> <i>(Check all that apply)</i>			
<b>10. POWER LEVEL</b>  000	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)
<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER	
<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A	

**12. LICENSEE CONTACT FOR THIS LER**

FACILITY NAME Edwin I. Hatch / Steven Tipps – Principal Engineer – Licensing	TELEPHONE NUMBER (Include Area Code) 912-537-5880
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**13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT**

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

<b>14. SUPPLEMENTAL REPORT EXPECTED</b> <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	<b>15. EXPECTED SUBMISSION DATE</b>
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**ABSTRACT** *(Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)*

On February 19, 2013, February 20, 2013 and February 25, 2013, OPDRV activities were performed while HNP-2 remained in Mode 5 without an operable secondary containment. These activities are prohibited by Technical Specifications (TS) 3.6.4.1, however recent NRC guidance provided in Regulatory Issue Summary (RIS) 2012-11 and in Enforcement Guidance Memorandum (EGM) 11-003, Revision 1 allowed the implementation of interim actions as an alternative to full compliance. These actions were compiled in an operating procedure for the OPDRV activities performed at HNP-2 during the 2R22 Refueling Outage in February.

The OPDRV activities were planned activities that were completed under the guidance of plant procedures and confirmed to have low safety significance based on interim actions taken. Since these actions were deliberate, no cause determination was necessary. A license amendment request will be submitted following NRC approval of the Technical Specifications Task Force (TSTF) traveler associated with generic resolution of this issue.

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Edwin I. Hatch Nuclear Plant Unit 1	05000-366	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2	OF	3
		2013	- 002	- 00			

**NARRATIVE**

PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor  
Energy Industry Identification System codes appear in the text as (EIIIS Code XX).

DESCRIPTION OF EVENT

The OPDRVs in Table 1 were performed while in Mode 5 without an operable secondary containment, contrary to Technical Specifications (TS) 3.6.4.1. The NRC recognized that such activities may need to be performed during refueling outages while activities were underway with the BWROG to formulate acceptable generic changes to BWR Technical Specifications. NRC Regulatory Issue Summary (RIS) 2012-11 communicated this guidance to the industry along with Enforcement Guidance Memorandum (EGM) 11-003, Revision 1 that allowed implementation of specific interim actions as an alternative to full compliance with the Technical Specifications while the improvements in the Technical Specifications are under development with the BWROG. Required interim actions specified in the EGM were incorporated into plant procedure 31-GO-OPS-025-0: OPERATIONS WITH THE POTENTIAL TO DRAIN THE REACTOR VESSEL (OPDRV). This procedure was then utilized on three occasions during the 2013 HNP-2 Refueling Outage.

**Table 1: HNP-2 OPDRVs Performed February 2013**

OPDRV Activity	Start	End
LPRM Removal and Replacement	02/19/2013, 0908 EST	02/19/2013, 1848 EST
CRD Drive Removal and Replacement	02/20/2013, 1130 EST	02/21/2013, 1115 EST
HCU Venting and Recoupling	02/25/2013, 1505 EST	02/26/2013, 1048 EST

CAUSE OF EVENT

Implementation of RIS 2012-11 and EGM 11-003, Revision 1 interim actions during the HNP-2R22 Refueling Outage was a planned activity. As such, no cause determination was performed for the events.

REPORTABILITY ANALYSIS And SAFETY ASSESSMENT

This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as operations prohibited by the HNP-2 Technical Specification 3.6.4.1.C.3, which prohibits performing activities identified as OPDRVs in Mode 5 while secondary containment is inoperable.

OPDRVs discussed in this report were performed during the 2R22 Refueling Outage and were accomplished using interim actions provided by the NRC in EGM 11-003, Revision 1. HNP-2 adhered to the NRC plain language meaning of OPDRV activities that could potentially result in draining or siphoning the RPV water level below the top of the fuel. This included evolutions involving aligning and realigning plant systems prior to achieving steady-state water level control, without taking credit for mitigating measures. HNP 2 also met the requirements which specify the minimum makeup flow rate and water inventory based on OPDRV activities with long drain down times. Further, an adequate defense in depth was maintained to minimize the potential for the release of fission products with secondary containment not operable by (a) monitoring RPV level to identify the onset of a loss of inventory event, (b) maintaining the capability to isolate the potential leakage paths, (c) prohibiting Mode 4 (cold shutdown) OPDRV activities, and (d) prohibiting movement of irradiated fuel with the spent fuel storage pool gates removed in Mode 5. All other Mode 5 Technical

**LICENSEE EVENT REPORT (LER)  
CONTINUATION SHEET**

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		2013	- 002	- 00			

Specifications requirements for OPDRV activities were followed. Since these compensatory measures were properly implemented, an adequate level of safety was provided during the performance of the OPDRV activities described in this report. Based on this information the performance of these OPDRV activities were determined to have a low safety significance.

CORRECTIVE ACTIONS

HNP will submit a license amendment request following NRC approval of the Technical Specifications Task Force (TSTF) traveler associated with generic resolution of this issue within the time constraints given in EGM 11-003, Revision 1.

ADDITIONAL INFORMATION

Other Systems Affected: None

Failed Components Information: None

Commitment Information: This report does not create any new permanent licensing commitments.

Previous Similar Events: A review of LERs and Corrective Action Program documents did not reveal any events similar to those discussed in this report within the last three years.

**Southern Nuclear Operating Company**



**Nuclear  
Licensing  
Form**

Licensing Action and Concurrence

NL-006-F03  
Version 1.0  
Page 1 of 6

NL Letter Number: NL-13-0742

Due Date (if applicable): 4/20/2013

Subject: Performance of Operations With Potential for Draining the Reactor Vessel (OPDRV) Under Specific NRC Interim Actions


RLE / Extension: Sharon Beverly 692-2804

<b>SECTION I – CORRESPONDENCE SCREENING (to be completed by RLE)</b>	<b>YES</b>	<b>NO</b>
I.1. Does this letter affect the FSAR or any other License Basis Documents? <i>If YES, complete 1.1.a. If unsure, obtain peer review from 10 CFR 50.59 qualified individual.</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
I.1.a Has Section III been completed to update each document? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
I.2. Does this letter require posting per 10 CFR 19? <i>If YES, ensure posting after submittal.</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
I.3. Does this letter contain Safeguards Information? <i>If YES, do NOT scan to SNC Intranet. Enter Special Handling Instructions below and review with the AA.</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
I.4. Does this letter contain information to be withheld from public disclosure (e.g., Proprietary or Non-Safeguards Security-Related Information)? <i>If YES, do NOT scan to SNC Intranet. If Proprietary, include appropriate affidavit. Enter Special Handling Instructions below and review with the AA.</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
I.5. Does this letter contain sensitive, limited access or distribution items? <i>If YES, enter Special Handling Instructions below and review with the AA.</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Special Handling Instructions</b>		
Click here to enter text.		
I.6. Oath or Affirmation Required? <i>If YES, verify proper letter template is used.</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
I.7. Verification Required? <i>If YES, use the guidance of NL-006-GL04.</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
I.8. Office of External Affairs and General Counsel Consultation Required? <i>If YES, obtain concurrence signature in Section II.</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
I.9. Engineering Independent Technical Review (ITR) Required? <i>If YES, obtain concurrence signature in Section II.</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
I.10. Challenge Board Required? <i>If YES, complete 1.10.a.</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
I.10.a Has Section III been completed to document results? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
I.11 RLE Signature: Sharon Beverly <i>Sharon Beverly</i>	Date: 4/4/2013	
I.12 Licensing Peer Review Signature: Steve Tippitt <i>Steve Tippitt</i>	Date: 4/4/2013	

*Evan Jones of Section 11 of LER*





<b>Southern Nuclear Operating Company</b>		
 <b>SOUTHERN COMPANY</b> <small>Energy to Serve Your World</small>	<b>Nuclear Licensing Form</b>	<b>LICENSING RECORD FILE CHECKLIST</b>
		NL-006-F04 Version 1.0 Page 1 of 1

**NOTE:** This checklist is completed by the RLE and retained per Step 6.2.7 of NL-006-001, "Administrative Processing of NRC Correspondence." Check all applicable boxes and assemble related documents into the record file package.

NL LETTER / CORRESPONDENCE NUMBER: NL-13-0742

- Verification and Validation copy of letter, if required (NL-006-003, "Outgoing NRC Correspondence," Steps 6.3.3, 6.3.4, 6.4.4 and 6.4.7).
- Pre-job briefing notes (NL-006-003, "Outgoing NRC Correspondence," Section 6.2.2).
- Copies/references of regulatory precedent, previous submittals, etc.
- List of documents reviewed. (See NL-006-GL03 "Guidelines for Preparing Submittals").
- Completed Licensing Action and Concurrence Form (NL-006-F03, "Licensing Action and Concurrence").
- Copies of relevant CRs and AIs.
- Relevant e-mail correspondence.
- Relevant telephone conversation records.
- Correspondence with NRC, such as RAIs.
- Licensing Project Plan, if required. (NL-006-GL06, "Guidelines for Preparation of Licensing Project Plans")
- Supporting documentation and/or a verification package, in accordance with NL-006-GL04, "Guidelines for Verification of Submittals," if required.
- Challenge Board notes, if performed.
- PRB/SRB Meeting Minutes, if required.

EGM 11-003, Rev 1

ML1215A409 Hope Creek LER

ML1213A440 Brunswick LER

Control Room Log Entries