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W. A. Widner
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February 24, 1981



Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2
REGARDING THE COMMISSION'S ORDERS OF JANUARY 13, 1981,
ON COMPLETION OF MARK I PROGRAM

Dear Mr. Eisenhut:

On February 10, 1981, Georgia Power Company representatives met with you and members of your staff to discuss the Orders which were issued on January 13, 1981, specifying the technical requirements and schedules for completion of the Mark I program for Plant Hatch Units 1 and 2. We had requested the meeting to discuss our concerns regarding the text of the Orders as pertains to the technical and schedule requirements for completion of the Mark I program. With regard to the technical requirements, we received reassurance that the Commission would be willing to work with us to resolve any problems which might arise during the remainder of the Mark I program effort.

Regarding our concerns about the schedules required by the Orders, correspondence received from your staff subsequent to our meeting indicates that the staff would consider a request to modify the schedules in the Orders if sufficient justification were provided.

Attachment 1 summarizes the latest information and estimates we have for operation of Units 1 and 2 between now and the completion dates specified in Section V of the Orders. As seen by the attachment, we project that the Order dates may be met only if operation of the plant goes as planned or better. Our projections of cycle length are based, of course, on the cycle energy specified when the fuel for the next cycle was purchased. This number is firmly established inasmuch as the fuel has been designed and built and the previous cycle exposure is known. Thus, the number of megawatt-days per ton which can be extracted from the next cycle is known. The other part of the equation which defines when the end of the next cycle will occur is how well the units perform during the cycle. For planning and scheduling purposes, we have used 80% as the estimated capacity factor. As a point of reference, excluding outages during which a unit was refueled, the capacity factors attained to date are 71% for Unit 1 and 69% for Unit 2.

It is important in your consideration of this request to be aware of the sensitivity of cycle length to changes in capacity factor. A 10% decrease in capacity factor will cause approximately 1 month increase in cycle length. Although we use 80% as an average for long-range planning

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purposes, we would not expect both units to perform at 80% in any given cycle. For instance, one unit may perform better and one worse. The possibility of a longer than expected cycle, when coupled with the consequences of not reaching the refueling window by the ordered date, has caused us to express our concerns regarding the schedules in the Orders.

If we do not reach the refueling window by the order date, we would be faced with a lengthy outage, estimated at 16 weeks, to complete the modifications required by the Order, and then we would start up the unit to operate for a short period of time until the refueling window is reached and then shut the unit down for refueling. Our objective is to eliminate the possibility that two outages would be required when one outage would suffice.

Due to the uncertainties of how well a particular unit will perform, we believe a modification of the Orders to allow operation until the refueling outages is needed to provide us with sufficient flexibility to most effectively plan the outages and operate the units. Those anticipated dates are mid-April, 1982 for Unit 1, and mid-January, 1982 for Unit 2.

Accordingly, Georgia Power Company hereby requests the Nuclear Regulatory Commission to modify your Orders of January 13, 1981, to tie completion of Mark I program work required by the Orders to each unit's respective 1982 refueling outage. However, should the Commission not be able to comply with this request, we request that the Orders be modified to show extended completion dates of July 1, 1982 for Unit 1 and April 1, 1982 for Unit 2.

In the alternative, should this request for modification of the schedules in the Orders be denied or not acted upon, please consider this letter Georgia Power Company's request for a hearing as provided for by Section VI of the Orders. Such hearing will be for the purpose of considering whether the licensee should be required to meet the completion dates provided in Section V of the Orders.

Very truly yours,

W.A. Widner

W. A. Widner

RDB/mb

Attachment

xc:George F. Trowbridge, Esquire

ATTACHMENT 1

OPERATING SCHEDULES
CYCLE 2 FOR HATCH-2; CYCLE 5 FOR HATCH-1

	HNP-1	HNP-2
UNIT SHUTDOWN FROM PREVIOUS CYCLE	02/27/81	11/01/80
UNIT STARTUP FOR NEXT CYCLE	06/13/81 est.	02/18/81 est.
UNIT SHUTDOWN FOR NEXT CYCLE	04/22/82 est.	01/18/82 est.
CAPACITY FACTOR ASSUMED	80%	80%
MARGIN TO ORDER DATE	App. 8 days	App. 13 days

SENSITIVITY: 10% CHANGE IN CAPACITY FACTOR = APP. 1 MONTH CHANGE IN
CYCLE LENGTH