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October 15, 1980

W. A. Widner
Vice President and General Manager
Nuclear Generation

Georgia Power
the southern electric system

United States Nuclear Regulatory Commission
Director of Nuclear Reactor Regulation
Washington, D. C. 20555

NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2
PROPOSED CHANGE TO UNIT 2 FSAR COMMITMENTS

Gentlemen:

A recent inspection by the Region II Office of Inspection and Enforcement reported by the regional director's letter of August 22, 1980, noted a failure to comply with certain portions of ANSI 45.2.2-1972 concerning receipt inspection and storage of safety-related materials and ANSI 45.2.13 concerning the handling of requisitions for such materials. In Appendix A and Section 17.2 of the Unit 2 Final Safety Analysis Report (FSAR) Georgia Power Company committed, without exception, to comply with these standards. That commitment was intended to apply only to safety-related equipment and is clarified in the proposed revision to indicate this intent.

In the case of inspections upon receipt (Section 5.2.1 of ANSI 45.2.2) however, a quality control inspection detailed in plant procedures requires a more stringent inspection and provides superior assurance of quality in safety-related equipment than a receipt inspection. No material is taken from the site warehouse and released for use in a safety-related function without this QC inspection. The receipt inspection thus provides only assurance of compliance with commerical terms on the part of the vendor and should not be subject to the requirements of ANSI standard.

The QC inspection upon release from storage also ensures that any damage to pipe ends, etc., which may occur during storage, will be detected and such equipment will be eliminated from use in safety-related systems. Use of pipe protective devices is thereby similarly reduced to a consideration of economics and should not be considered as a safety concern and conducted under the requirements of ANSI 45.2.2 Sections 3.5.1 and 6.4.2

The commitment to ANSI 45.2.13 requires clarification of the definition of a "requisition" as that word is used in plant procedures. A Plant Hatch requisition is not a "procurement document" in the sense of the ANSI standard and should not be required to meet the standard's requirements. The change to Section 17.2 of the FSAR clarifies the degree of compliance with this standard.

A timely review by the NRC of these revisions to FSAR commitments is requested so that interim measures employed at the plant to meet the present

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overly restrictive requirements can be discontinued. We request that approval of these changes by documented by letter for our files in order to close out the corrective action for the infractions cited by regional I&E inspectors. Formal promulgation of these changes will be made for insertion into FSAR when the first FSAR revision issued pursuant to 10CFR50.71 is made around July 1982.

The Plant Review Board and the Safety Review Board have reviewed these proposed change to the Unit 2 FSAR, and have determined that an unreviewed safety question is not involved. The quality control inspection made on all safety-related components and equipment prior to use provides superior assurance of quality and meets the intent of the ANSI standard section with which these changes take exception. The possibility of a new accident or malfunction not previously considered has not be created; nor have the consequences of previously analyzed accidents or malfunctions been changed. Margins of safety have not been reduced nor operating limits changed.

Very truly yours,

J. T. Beckham Jr.
for W. A. Widner

WEB/mb

Sworn to and subscribed before me this 15th day of October, 1980.

Mae H. Battle
Notary Public

Notary Public, Georgia, State at Large
My Commission Expires Sept. 20, 1983

xc: Max Manry
R. F. Rogers, III
J. P. O'Reilly

ATTACHMENT 1

NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2
PROPOSED DETERMINATION OF AMENDMENT CLASS

Pursuant to 10 CFR 170.12 (c), Georgia Power Company has evaluated the attached proposed amendment to Operating Licenses DPR-57 and NPF-5 and has determined that:

a) The proposed amendment does not require the evaluation of a new Safety Analysis Report or rewrite of the facility license;

b) The proposed amendment does not contain several complex issues, does not involve ACRS review, or does not require an environmental impact statement;

c) The proposed amendment does not involve a complex issue, an environmental issue or more than one safety issue;

d) The proposed amendment does not involve a single safety or environmental issue;

e) The proposed change is one of clarification of intent;

f) The amendment is therefore a Class II amendment for one unit, and a Class I amendment for the other unit. Both units are effected through a common Quality Assurance Program, even though only Unit 2 FSAR is referenced for change.

APPENDIX A

Regulatory Guide 1.38 - Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage and Handling of Items for Water-Cooled Nuclear Power Plants (3/16/73)

Conformance

During plant construction the intent of the basic reference for this Guide, N45.2.2-1972, is being followed; thus HNP-2 is in conformance with the intent of this guide.

Following receipt of the operating license, HNP-2 will comply with this guide and ANSI N45.2.2-1972 for all safety systems with the following exceptions:

a. Section 5.2.1

The plant procedures do not allow any materials or equipment designated for use in a safety-related system to be issued from the warehouse without a quality control inspection. Because of this restriction, shipping damage inspections upon receipt at the warehouse do not provide a necessary quality function. They are employed to provide an economic assurance function only.

The more stringment QC inspection provides superior assurance of quality in safety-related equipment, and does not, therefore, reduce the effectiveness of the Quality Assurance Program by its substitution for section 5.2.1 inspections as the inspection of record. Receipt inspections may be made for commercial reasons, but will not be conducted in accordance with section 5.2.1 of ANSI 45.2.2-1972.

b. Sections 3.5.1 and 6.4.2

As noted in paragraph a. above, no materials or equipment designated for use in safety-related systems is installed in a safety system without a quality control inspection. Thus any damage which might occur to unprotected equipment or materials during storage or transport would not be allowed to adversely affect the quality of safety-related systems. Use of protective devices as suggested by sections 3.5.1 and 6.4.2 is therefore reduced to an economic measure, and is not a question of the quality of safety-related material. Use of such devices will, therefore, not be regulated by Sections 3.5.1 and 6.4.2 of ANSI 45.2-2, but will be based upon engineering judgement and economic considerations.

17.2.2.3 Plant Responsibility

It is the responsibility of the Plant Manager and his staff to comply with the Quality Assurance Program and regulatory requirements for all safety-related site-based activities and to ensure that the plant is being operated and maintained in accordance with approved procedures.

The Senior Quality Control Specialist (SQCS) reports to Plant Management and is assisted by any required technical and inspection personnel. The SQCS monitors all maintenance and modification activities through his control of the Maintenance Request (MR) system. He can specify any special inspection or test requirements and review results. He controls plant procurement document requirements and nonconforming materials. He has the authority to stop work through appropriate channels on a repair or modification to a safety-related system if it is not being performed in accordance with the provisions of the QA Program or if the material being used does not meet the applicable requirements.

17.2.2.4 Training and Indoctrination

The MQA is responsible for establishing the requirements for QA training and indoctrination for both QA Department and non-QA Department personnel whose activities affect quality. QA Department personnel, in accordance with QA Department procedures, will receive formal and on-the-job training in QA policies and requirements, procedures, plant operation and maintenance, nonconformance control and auditing. Records of training and qualification of QA Department personnel will be maintained by the MQA, who will assure complicance to requirements. Non-QA Department personnel, in addition to the training described in Section 13.2, will receive QA indoctrination which includes QA policies and procedures. In addition to this indoctrination, plant operators, maintenance personnel, test personnel, QC and health physics personnel will receive specialized instruction in their areas of QA Program implementation. The Senior Methods and Training Specialists will schedule, evaluate, and maintain records of training and indoctrination of plant personnel. Certain mechanical, QC, and other personnel will require certification for specialized activities (i.e., welding, nondestructive examination, etc.) in accordance with approved codes and standards. Written procedures will describe the personnel requiring special certification, method of certification, time limit, method of retraining, re-examination and/or recertification, and records to be retained. A suitable combination of lectures, on-the-job instruction, videotape, and offsite schools will be used to assure personnel whose jobs affect quality are adequately trained and qualified.

Nuclear Power Plants" will be required by contractors and suppliers to the degree necessary to ensure compliance with the QA Program.

It is the responsibility of the Georgia Power Company's Engineering Department, Purchasing Department, and Construction Department to comply with the QA Program for plant-associated activities such as procurement, qualification of suppliers, new plant design, and the necessary redesign or evaluation of any of the safety-related systems, structures, or components.

Commitments and/or exceptions to NRC Regulatory Guides are addressed in Appendix A of the FSAR. In addition to the Regulatory Guides addressed in Appendix A, the following ANSI standards are also committed to in this section:

a. N45.2.5 (1974) - Installation, Inspection and Testing of Structural Concrete and Structural Steel

b. N45.2.8 (1975) - Installation, Inspection and Testing of Mechancial Equipment and Systems

c. N45.2.12 (1977) - Auditing

d. N45.2.13 (1976) - Control of Procurement of Items and Services

The quality assurance program for Plant Hatch implements the requirement of ANSI N45.2.13-1976 with the following exceptions:

Paragraph 1.2.3 - The acceptability of a supplier may be accomplished by methods other than review of a documented quality program.

Paragraphs 1.3 & 3.1 - Procurement Documents do not include purchase requisitions. N45.2.10 requires only contracturally binding documents to be called procurement documents.

Paragraph 3.2.3 - Georgia Power Company will assure that suppliers of safety-related materials and services provide acceptable quality. This may be accomplished by documented methods other than direct review of a supplier's quality assurance program.

Paragraph 6.4 - Refer to above comments for Paragraphs 1.3 & 3.1.