

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

May 10, 1993

Docket Nos. 50-424 and 50-425

> Mr. W. G. Hairston, III Senior Vice President -Nuclear Operations Georgia Power Company P. O. Box 1295 Birmingham, Alabama 35201

Dear Mr. Hairston:

REQUEST FOR ADDITIONAL INFORMATION REGARDING NEW 10 CFR PART 20, VOGTLE NUCLEAR GENERATING PLANT, UNITS 1 AND 2

(TAC NOS. M84529 AND M84530)

The NRC staff is reviewing your application of September 17, 1992, for license amendments to change the Vogtle Technical Specifications (TS) to implement revisions to 10 CFR Part 20 as published in the Federal Register (56 FR 23360 dated May 21, 1991). Our review includes your letters of January 22 and February 26, 1993, that responded to our previous requests for additional information. We find that two of your previous responses require further change or additional information for completion of our review.

Our previous Request 470.3 asked that you revise TS Bases 3/4.11.1.4, "Liquid Holdup Tanks," to use a multiplier of "10 times" for the values of Appendix B, Table 2, Column 2 to 10 CFR Part 20.1001-20.2401. Your response proposed to incorporate a multiplier of 10 times, as requested. However, since issuing Request 470.3, the NRC staff has determined that our request was inappropriate. Accordingly, you should revise your proposed changes to TS Bases 3/4.11.1.4 to delete the addition of the words "10 times."

Our previous Request 470.6 asked that you revise your proposed administrative controls in TS 6.11.2, "High Radiation Area," to specify a dose rate range greater than 1000 mrem in 1 hour but less than 500 rads in 1 hour to distinguish the controls needed for a High Radiation Area from the requirements for a Very High Radiation Area (10 CFR 20.1602). You responded that TS 6.11.2 conservatively applies access control methods that are applicable to all accessible areas in which radiation levels exceed 1000 mrem per hour, including Very High Radiation Areas, and therefore, that specifying the requested dose rate range is unnecessary. We do not agree that the controls in existing TS 6.11.2 for the High Radiation Area are conservative or adequate with respect to 10 CFR 20.1602. The access control measures imposed by Vogtle's TS at 1000 mrem in 1 hour are not adequate to meet the "additional measures" required by 10 CFR 20.1602, over those required in 10 CFR 20.1601. The High Radiation Area TS provides alternate methodology from the "locking"

9305190380 930510 ADDCK 05000424 requirement specified in 10 CFR 20.1601 for areas in which an individual might receive a deep-dose equivalent of 100 mrem in 1 hour at 30 centimeters from the radiation source. The alternate locking requirement specified by the TS is for 1000 mrem in 1 hour and above; it is not an "additional measure" relative to 10 CFR 20.1602. We are unable to accept the proposed TS change unless it is limited to less than 500 rads in 1 hour to distinguish it from the requirements of 10 CFR 20.1602. Accordingly, we again request that you specify a range of greater than 1000 mrem in 1 hour but less than 500 rads in 1 hour.

Your written response to the enclosure is requested within 45 days of receipt of this letter. If you have questions regarding the enclosure or are unable to meet the requested response date, contact me at (301) 504-3049.

This requirement affects fewer than ten respondents, and therefore, it is not subject to Office of Management and Budget review under P. L. 96-511.

Sincerely.

Darl S. Hood, Senior Project Manager Project Directorate II-3 Division of Reactor Projects - 1/II Office of Nuclear Reactor Regulation

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Mr. W. G. Hairston - 2 -May 10, 1993 requirement specified in 10 CFR 20.1601 for areas in which an individual might receive a deep-dose equivalent of 100 mrem in 1 hour at 30 centimeters from the radiation source. The alternate locking requirement specified by the TS is for 1000 mrem in I hour and above; it is not an "additional measure" relative to 10 CFR 20.1602. We are unable to accept the proposed TS change unless it is limited to less than 500 rads in 1 hour to distinguish it from the requirements of 10 CFR 20.1602. Accordingly, we again request that you specify a range of greater than 1000 mrem in 1 hour but less than 500 rads in 1 hour. Your written response to the enclosure is requested within 45 days of receipt of this letter. If you have questions regarding the enclosure or are unable to meet the requested response date, contact me at (301) 504-3049. This requirement affects fewer than ten respondents, and therefore, it is not subject to Office of Management and Budget review under P. L. 96-511. Sincerely, DARL HOOD Darl S. Hood, Senior Project Manager Project Directorate II-3 Division of Reactor Projects - 1/11 Office of Nuclear Reactor Regulation See next page

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