

Georgia Power Company  
333 Piedmont Avenue  
Atlanta, Georgia 30308  
Telephone 404 526-7025

Mailing Address  
Post Office Box 4545  
Atlanta, Georgia 30302

March 5, 1982



W. A. Widner  
Vice President and General Manager  
Fossil and Hydro Generation

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  
RESPONSE TO NUREG-0803

Gentlemen:

Enclosed is our response to NUREG-0803, "Generic Safety Evaluation Report Regarding Integrity of BWR Scram System Piping." Our response provides the plant specific input requested by NUREG-0803 and your August 31, 1981 letter, and identifies areas where the discussions and assumptions made in NEDO-24342, "General Electric Evaluation in Response to NRC Request Regarding BWR Scram System Pipe Breaks," and/or NUREG-0803 do not apply to Plant Hatch. The response supports the conclusion that a scram discharge (SD) system pipe crack need not be considered. In order to support this conclusion, we are committing to the following items as recommended in the attached report:

- a. We will include weld examination of the SD headers in the ISI program when it is updated in January, 1983, per 10 CFR 50.55a.
- b. We will review and update maintenance procedures as necessary to ensure that loss of SD system integrity will not occur at times when such integrity is required.

Procedure reviews and any required updates will be complete by May 1, 1982.

- c. We will make any modifications necessary to ensure as-built seismic integrity of SD system piping and supports per I&E Bulletin 79-14. These modifications will be completed, pending availability of parts, during the first refueling outage following completion of stress analysis in August, 1982.

We believe that completion of the above items will further reduce the probability of this unlikely event. It appears likely that the BWR Owners' Group will decide to perform a generic Probabilistic Risk Assessment (PRA) to confirm that this event is sufficiently remote to preclude consideration.

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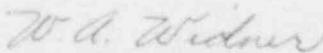
In regard to your request that the BWR Owner's Group modify Emergency Procedure Guidelines, we submit the following:

Per its charter, the BWR Owners' Group cannot respond directly to NRC requests for utility action, except at the discretion of its members. Neither can we commit the Owners' Group to a specific course of action except by our participation in Owners' group decisions by vote. Thus, we can only provide a response to the staff's guidance to the BWR Owners' Group in NUREG-0803 as if it were addressed to Georgia Power Company.

However, the BWR Owners' Group has discussed the guidance of NUREG-0803 regarding modification of the Emergency procedure Guidelines and acknowledges the benefits of treating the subject generically. The BWR Owners' Group is in the process of completing an extension of the Guidelines to include steps for reactivity control, and certain other modifications to the Guidelines which have been discussed with your staff. It is our judgment that completion of these modifications outweighs, in immediate importance, the NUREG-0803 guidance for other Guideline modifications. After current activities on the Guidelines are substantially complete, we will support a preliminary study by the BWR Owners' Group to determine the best approach to fulfilling the intent of the guidance provided in NUREG-0803. It is clear that the best approach will involve modification of the Guidelines. When that study is complete, currently expected to be near the end of the first quarter of 1982, the Owners' Group will determine whether to authorize specific actions to modify the Emergency Procedure Guidelines. We will advise you of the result of that decision and the Owners' Group's plan at that time.

Please contact this office if you desire further information.

Very truly yours,

  
W. A. Widner

REB/mb  
Enclosure  
xc: M. Manry  
R. F. Rogers, III  
J. P. O'Reilly (NRC - Region II)