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Georgia Power
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50-366

HL-03231

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Edwin I. Hatch Nuclear Plant
Biennial Reviews of Nuclear Plant Procedures

Gentlemen:

Georgia Power Company hereby requests a change to the biennial review of nuclear plant procedures as described in the Edwin I. Hatch Nuclear Plant Unit 2 Final Safety Analysis Report (FSAR), section 13.5.1 (and the Unit 1 FSAR section 13.7 by reference). Currently, the FSAR requires that plant procedures be reviewed at least every 2 years. This procedure review process is controlled by internal plant procedures. These review requirements were developed during plant licensing to address the procedure review philosophy of ANSI N18.7-1972 and the revised ANSI N18.7-1976 endorsed by Regulatory Guide 1.33, Revision 2.

Based on the justifications in Attachment 1, and in accordance with the guidance provided on December 21, 1992 from Charles Rossi to the Division of Reactor Safety Regional Directors, Georgia Power Company requests a revision to the biennial procedure review requirements at the Edwin I. Hatch Nuclear Plant. The Quality Assurance Program will be revised, using guidance provided in the above referenced NRC memorandum, as appropriate and include a description of how emergency operating procedures (EOPs) and abnormal operating procedures (AOPs) will be accurately maintained. EOPs and AOPs will continue to be reviewed at least every two years by a knowledgeable individual to determine whether changes are necessary or desirable. Attachment 2 provides the proposed FSAR wording revisions.

Pursuant to the requirements of 10 CFR 50.54(a), Georgia Power Company has concluded that there would be no reduction in commitments in the Quality Assurance Program as a result of this change. However, as a conservative

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measure, Georgia Power Company is requesting NRC approval before implementing this change. Following NRC approval, Georgia Power Company will update its internal procedures and the FSAR and transmit those changes to the NRC on schedules consistent with the regulations.

Both the Plant Review Board and the Safety Review Board have reviewed and recommended approval of this proposed change. Georgia Power Company requests that this proposed change be promptly considered due to the cost savings associated with this change.

A copy of this letter will be sent to Mr. J. D. Tanner of the Environmental Protection Division of the Georgia Department of Natural Resources.

Sincerely,

J. T. Beckham, Jr.

JTBJr/JMG
Attachments

cc: Georgia Power Company
Mr. H. L. Sumner, Jr., General Manager - Plant Hatch
NORMS

U. S. Nuclear Regulatory Commission, Washington, DC
Mr. K. N. Jabbour, Licensing Project Manager - Hatch

U. S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebneter, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch
Mr. F. Jape

State of Georgia
Mr. J. D. Tanner, Commissioner, Department of Natural Resources

ATTACHMENT 1

Justification for Change to Biennial Audits of Procedures

Introduction

Currently, the Edwin I. Hatch Nuclear Plant (Plant Hatch) Unit 2 FSAR section 13.5.1 (and the Unit 1 FSAR section 13.7 by reference) requires that plant procedures which come under the scope of Regulatory Guide 1.33, Rev. 2 be reviewed at least every 2 years. These reviews were developed during plant licensing to address the procedure review philosophy of ANSI N18.7-1972 and the revised ANSI N18.7-1976 endorsed by Regulatory Guide 1.33, Revision 2. The plant requirement for the biennial review process can be found in plant procedures.

Plant Hatch has approximately 2,000 procedures which fall under the 2-year review requirements. A conservative estimate for the biennial review time for these procedures is 8,000 manhours. Also, the documents supporting the review of each procedure are considered life-of-plant documents; therefore, more space must be allocated each year for storage.

Commitments relative to the review of the emergency implementing procedures and the security procedures will remain unchanged.

Discussion

ANSI N18.7-1976 provides for a static biennial review process, but recognizes that the procedure review process may change as a plant reaches operational maturity. An ongoing dynamic process is inherently required in maintaining procedures in an accurate and useful condition. This process requires that procedural controls be in place to provide for procedure changes as the plant design, regulatory, or operational requirements change.

In addition, most of these procedures are used frequently by plant personnel. As plant personnel use these procedures, problems are identified and resolved through various internal programs, some of which are discussed below. Once identified, procedural issues are addressed in an expeditious manner.

The procedure maintenance processes are continually evaluated and have effected controls to ensure that potential procedural impact is assessed and revisions are made based on input from a number of different programs. The following programs adequately provide input to procedure revisions and changes:

(1) **Plant Design Control Program**

The plant design control program defines the process to assure that procedure changes are properly identified and implemented consistent with the design modification process. This review requires that all procedures potentially affected by the modification be identified, and changes and revisions be ready to be implemented upon completion of the modification.

(2) **Operating Experience Program**

The operating experience program requires the review of NRC bulletins, notices, and generic letters; General Electric service information letters (SILs) and rapid information communication services (RICSILs); INPO significant operating event reports (SOERs), significant event reports (SERs), and significant by others reports (SOs); Nuclear Network operating plant experience reports (NNOEs), operation and maintenance reminders (O&MRs), significant event notifications (SENs), and recurring significant event notifications (RSENs). This review includes an evaluation of applicable procedures and the initiation of any required procedure changes.

(3) **Deficiency Control Program**

The deficiency control program provides the process where any individual onsite or offsite who identifies any potential deficiency can report it directly to the Unit Shift Supervisor. Plant personnel are trained to use the deficiency card program as the primary means of documenting deficiencies in procedures, designs, licensing commitments, etc. As potential deficiencies are identified, formal processes through the Nuclear Safety and Compliance Group are in place for their resolution. This includes procedure revisions, if appropriate.

(4) **FSAR Revisions**

Revisions to the FSAR require safety evaluations. During the development of this safety evaluation, an individual is required to determine if a procedure revision should result from the FSAR revision. The procedure revision would therefore meet the intent covered by the biennial review process.

(5) **Vendor Documents Review Program**

The vendor documents review program requires the review of vendor manuals and revisions to vendor manuals. This review includes an evaluation of applicable procedures and the initiation of any required procedure changes.

(6) **Quality Assurance Program**

The Quality Assurance Program includes a review of certain procedures as part of the audit and surveillance process. The Quality Assurance Program assigns the responsibility to the Safety Audit and Engineering Review (SAER) group to audit the procedural process during an audit. The Plant Review Board (PRB) also performs reviews of plant procedures as part of the procedure revision process. Input into the procedure revision process may be provided by either of these two avenues.

(7) **Procedure Control Program**

The procedure control program provides direction to evaluate the need for a procedure change that is identified through the performance of a procedure. If a procedure has a technical error which could result in a safety hazard or violation of plant commitments, a Plant Hatch procedure requires an individual to stop work, safely back out of the procedure, and notify the supervisor. These changes may be required prior to continuation of the performance of the tests, or after completion of the tests, depending on the nature of the discrepancies.

(8) **Plant Personnel Feedback**

Plant personnel including operators are trained and directed by procedure to report to management any procedural deficiencies or concerns which may prevent or impact their implementation. Feedback into the procedure revision process may be initiated through such programs as the deficiency card program.

(9) **Plant Event Analysis and Resolution Program**

The plant event analysis and resolution program provides the process of documenting and dispositioning any event which, because of its significance or frequency of repetition, requires documented investigation and follow-up. Specifically, an event analysis is conducted by an event review team for unplanned reactor scrams which result in control rod motion; complex or significant transients or events; significant routine reportable events; or other events identified by Operations Line Management. The purpose of the event analysis is to develop a chronological sequence of events, determine the direct cause(s) and root cause(s), confirm proper plant response and/or identify deficiencies and provide recommended corrective action. The corrective action section addresses correction of the deficiency, investigation of similar conditions, determination of root cause of the event, and development of corrective action(s) to prevent recurrence.

Proposed Change

As evidenced by the number of programmatic controls discussed above for procedure input and revision, the biennial review process is no longer necessary for many procedures. The impact on plant resources for the biennial review process reduces the site personnel's ability to concentrate on issues of greater significance to plant safety. In accordance with the guidance provided on December 21, 1992 from Charles Rossi to the Division of Reactor Safety Regional Directors and based on the previous submittal by Plant Farley on July 26, 1991 supplemented on October 1, 1991 and the NRC letter of acceptance of the changes of October 29, 1991, and the previous submittal by Plant Vogtle on April 3, 1992 supplemented on August 3, 1992, and the subsequent verbal NRC acceptance, the Hatch biennial process may be modified as follows:

1. Applicable plant procedures will continue to be reviewed by the Plant Event Analysis and Resolution Program following an unusual incident, such as an accident, an unexpected transient, significant operator error, or equipment malfunction and following any modification to a system by the Plant Design Control Program.

2. The periodic review of security procedures should continue as defined in the Security Plan.

3. The periodic review of emergency implementing procedures should continue as defined in the Emergency Plan.

4. Non-routine procedures (procedures such as emergency operating procedures and abnormal operating procedures) shall continue to be reviewed at least every two years and revised as appropriate.

5. At least once every two years, the QA organization shall review a representative sample of the routine plant procedures that are used more frequently than two years.

In addition, the new 10 CFR 20.1101(c) states that the licensee shall periodically (at least annually) review the radiation protection content and implementation. This may require certain procedural reviews to be performed. The activities required under this regulation will be defined as the new 10 CFR 20 program is implemented.

The above requirements (items 1 through 4) will either be identified in the plant administrative procedures consistent with the requirements of section 6.8.2 of the Plant Hatch Unit 1 and Unit 2 technical specifications or in the QA program (for item 4). Procedures which have requirements for a periodic review will continue to be defined in the administrative procedures; therefore, the requirements of technical specifications section 6.8.2 will continue to be met.

Conclusion

The FSAR and QA program documents should be revised to provide for biennial Quality Assurance review of the plant procedural development and maintenance program utilizing the above representative sampling process. This biennial review would replace the current commitment of a biennial review of all plant procedures, except for specific procedure classifications defined previously, and will provide verification that the existing plant programs and activities are effective in maintaining procedures current.

These changes have been reviewed in accordance with the requirements of 10 CFR 50.54(a) and it has been determined that there is no reduction in QA commitments. The basis for this determination is that existing controls, which have been previously defined, are adequate to ensure the overall accuracy of the procedures at Plant Hatch. Similar provisions with similar procedural control programs have been approved for Plant Farley. The Plant Hatch implementation will be consistent with this previous NRC direction.

ATTACHMENT 2

PROPOSED FSAR MARKUPS

13.5 PLANT PROCEDURES

13.5.1 SYSTEM OR PLANT PROCEDURES

All safety-related operations are conducted in accordance with detailed written plant procedures. The procedures manual, which includes all plant procedures, is prepared by the plant operating organization with the technical assistance of General Electric Company (GE), Bechtel Power Corporation (BPC), Southern Company Services, Inc. (SCS), and other technical support organizations as needed. The plant procedures follow the guidance of standard American National Standards Institute (ANSI) N18.7-1976, "Administrative Controls for Nuclear Power Plants." Prior to initial use, procedures related to nuclear safety are reviewed and approved by the plant review board as described in subsection 13.4.2 and forwarded for approval to the appropriate member of plant management designated by the general manager-nuclear plant (GMNP) (Hatch), the assistant general manager-plant support (AGM-PS), or the assistant general manager-plant operations (AGM-PO). The Emergency Implementing Procedures ~~and the Emergency Operating Procedures~~ are reviewed on an annual basis to determine adequacy, accuracy, and need. All other safety-related procedures are reviewed ~~on a biennial basis~~ as described in the discussion on Regulatory Guide 1.33. An updated set of plant procedures is always available in the main control room (MCR). Insert 1

Day-to-day operations are carried out by the various plant departments. Each department is assigned an area of responsibility and operates with some degree of independence and freedom from close supervision; yet their actions are closely coordinated to best achieve the common purpose.

The GMNP (Hatch), the AGM-PO, or the AGM-PS issues procedures governing employee actions and established standards for plant operation. These procedures contain administrative restrictions and plant requirements established to ensure safe operation of the plant within the limitations set by plant licenses and the Technical Specifications. They assure plant activities are conducted in a manner to protect the general public, plant personnel, and equipment.

A formalized system of written procedures conforming to the requirements of the operating quality assurance (QA) program (section 17.2) is employed in support of the standard practices.

Systems and components described in the FSAR are maintained with the aid of written procedures. These maintenance procedures consider vendor or manufacturer's technical manuals and recommendations, as well as engineering inputs and regulatory requirements.

INSERT 1 A provision is made to ensure that Emergency Operating Procedures and Abnormal Operating Procedures are reviewed at least every two years by a knowledgeable individual to determine whether changes are necessary or desirable.

As a part of the overall quality assurance program, the SAER group performs various audits (described in 17.2) to assure that the procedural process is working and that procedures are being properly maintained.

- Managing the Plant Hatch SAER staff.
- Ensuring that satisfactory QA programs are in effect.
- Developing, scheduling, and carrying out the audit program on quality-related activities.
- Ensuring that site activities conform to QA program requirements during operation, maintenance, and modification of the plant.

The plant site and corporate SAER personnel provide technical and administrative support to the SAER department in the performance of its assigned responsibilities.

Qualification requirements for HNP SAER department personnel are in accordance with Regulatory Guide 1.146.

The SAER department personnel have the authority to stop work or plant operations through appropriate channels when the repair, modification, or operation of a safety-related system, structure, or component is not performed in accordance with the provisions of the QA program. Disputes arising from differences of opinion between SAER personnel and other department personnel will be resolved at the appropriate level of management.

Insert 2

The personnel responsible for performing QA/QC functions have sufficient authority and freedom to:

- Identify quality problems.
- Initiate, recommend, or provide solutions through designated channels.
- Verify implementation of solutions.

INSERT 2 To assure that controls are in place to effectively maintain plant procedures, the SAER staff will perform a biennial audit of plant procedures and the procedural development and maintenance program utilizing a representative sampling process.

A.33 REGULATORY GUIDE 1.33 - QUALITY ASSURANCE PROGRAM REQUIREMENTS (OPERATION) CONFORMANCE (REVISION 2, FEBRUARY 1978)

Conformance

Georgia Power Company has chosen to use American National Standards Institute (ANSI) N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," instead of ANSI N18.7-1972. With one exception, the Quality Assurance Program complies with this regulatory guide as addressed in section 17.2.

Exception is taken to Paragraph 5.2.16, "Measuring and Test Equipment," of ANSI N18.7-1976 which requires "equipment be suitably marked to indicate calibration status." Installed process instruments at Plant Hatch are identified by unique instrument numbers. These instrument numbers are traceable to calibration schedules and calibration records. These instruments are not tagged or labeled with the date due to next calibration.

Insert 3

INSERT 3 During original plant licensing, a 2 year review process for plant procedures was developed to meet the requirement of Regulatory Guide 1.33 and ANSI 18.7-1976. Since the procedural process has now matured and adequate programs to assure procedural revisions consistent with plant design, operational, and regulatory requirements are in place, this original commitment has been modified to require biennial Quality Assurance audits of the procedural development and maintenance program utilizing a representative sampling process. Therefore, the 2 year review process is no longer required.

In place of the biennial review, the following provisions have been implemented. In addition, programmatic procedural controls will continue to be in place to update plant procedures as new design information or other factors warrant.

1. Applicable plant procedures will be reviewed following an unusual incident, such as an accident, an unexpected transient, significant operator error, or equipment malfunction and following any modification to a system.

2. The periodic review of security procedures will be performed in accordance with the Security Plan.

3. The periodic review of emergency implementing procedures will be performed in accordance with the Emergency Plan.

4. Non-routine procedures (procedures such as emergency operating procedures and abnormal operating procedures) shall continue to be reviewed at least every two years and revised as appropriate.

5. At least once every two years, the QA organization shall review a representative sample of the routine plant procedures that are used more frequently than two years.