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*the southern electric system*

W. G. Hairston, III  
Senior Vice President  
Nuclear Operations

HL-1067  
000467

October 10, 1990

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

PLANT HATCH - UNITS 1, 2  
NRC DOCKETS 50-321, 50-366  
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:  
CORPORATE AND ONSITE ORGANIZATION

Gentlemen:

In accordance with the provisions of 10 CFR 50.90, as required by 10 CFR 50.59(c)(1), Georgia Power Company (GPC) hereby proposes changes to the Plant Hatch Units 1 and 2 Technical Specifications (TS) and Environmental Technical Specifications (ETS), Appendices A and B, respectively, to Operating Licenses DPR-57 and NPF-5.

The proposed amendment incorporates recent changes to the Plant Hatch onsite and Quality Assurance organizations, and slightly modifies Plant Review Board (PRB) responsibilities contained in TS section 6.0, Administrative Controls, and the ETS.

Enclosure 1 provides detailed descriptions of the proposed changes and circumstances necessitating the change request.

Enclosure 2 details the bases for our determination the proposed changes do not involve significant hazards considerations.

Enclosure 3 provides page change instructions for incorporating the revised pages. The proposed changed TS and ETS pages for Unit 1 and Unit 2 follow Enclosure 3.

To allow time for procedure revisions and orderly incorporation into copies of TS, GPC requests the proposed amendment, once approved by the NRC, be issued with an effective date to be no later than 60 days from the date of issuance of the amendment.

In accordance with the requirements of 10 CFR 50.91, a copy of this letter and all applicable enclosures will be sent to Mr. L. Barrett of the Environmental Protection Division of the Georgia Department of Natural Resources.

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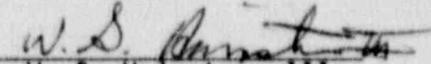
U.S. Nuclear Regulatory Commission

October 10, 1990

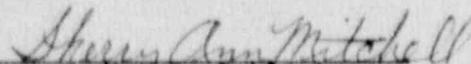
Page Two

Mr. W. G. Hairston, III states he is Senior Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and to the best of his knowledge and belief, the facts set forth in this letter are true.

GEORGIA POWER COMPANY

BY:   
W. G. Hairston, III

Sworn to and subscribed before me this 10<sup>th</sup> day of October 1990.

  
Notary Public

MY COMMISSION EXPIRES DEC. 15, 1992

GKM/eb  
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Enclosures:

1. Basis for Change Request
2. 10 CFR 50.92 Evaluation
3. Page Change Instructions

c: Georgia Power Company

Mr. H. L. Sumner, General Manager - Nuclear Plant  
Mr. J. D. Heidt, Manager Engineering and Licensing - Hatch  
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.  
Mr. F. Rinaldi, Acting Licensing Project Manager - Hatch

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

State of Georgia  
Mr. L. Barrett, Commissioner - Department of Natural Resources

ENCLOSURE 1

PLANT HATCH - UNITS 1, 2  
NRC DOCKETS 50-321, 50-366  
OPERATING LICENSES DPR-57, NPF-5  
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:  
CORPORATE AND ONSITE ORGANIZATION

BASIS FOR CHANGE REQUEST

PROPOSED CHANGE 1:

The change revises the administrative controls in the TS and ETS to reflect changes in the company organization. Specifically, Unit 1 and Unit 2 TS sections 6.1, 6.2, and 6.8, and ETS section 5.0 reflect a change in titles for the Plant Manager and Plant Support Manager. The Plant Manager's new title is Assistant General Manager-Plant Operations, and the Plant Support Manager's new title is Assistant General Manager-Plant Support. Also, in section 6.4, the Code of Federal Regulations (CFR) reference for the unit staff training/retraining programs was changed from Appendix A of Part 55 to 10 CFR 55.

Basis for Proposed Change 1:

The title changes discussed above are administrative in nature and, therefore, do not reduce the level of management oversight of activities affecting safety. The CFR reference change reflects the fact that Part 55 does not contain an Appendix A; Part 55 addresses requirements for operator licenses in Subparts A through H.

PROPOSED CHANGE 2:

Organizational changes have resulted in the retitling of the General Manager-Quality Assurance to the Manager-Safety Audit and Engineering Review (MSAER). The ETS of both units were revised to reflect this change in the Table of Contents, and sections 5.1 and 5.3. Also, Specification 6.2.2.h was revised to state "plant operators shall hold a reactor operator license" instead of "plant operators and assistant plant operators shall hold a reactor license." In addition, in Specification 6.2.2.h, the titles of plant personnel required to hold senior operator licenses were modified to reflect the current plant organization. Finally, an editorial revision to sections 6.9.1 and 6.9.2 is also proposed to change the Regional Office of Inspection and Enforcement to the NRC Regional Office.

Basis for Proposed Change 2:

The title changes discussed above are administrative in nature and, therefore, do not reduce the level of management oversight of activities affecting safety.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:  
CORPORATE AND ONSITE ORGANIZATION

BASIS FOR CHANGE REQUEST

Deleting the requirement for an assistant plant operator to hold an operator license and changing the title of an individual who holds a senior operator license are also administrative changes. Under the new organization, only individuals holding a reactor operator license are plant operators. As always, any individual who manipulates the controls at Plant Hatch will be licensed pursuant to 10 CFR Part 55. As stipulated in 10 CFR 55.4, "controls" means "apparatus and mechanisms the manipulation of which directly affects the reactivity or power level of the reactor." Therefore, this change does not decrease the required level of training or reduce the qualifications of plant personnel.

PROPOSED CHANGE 3:

This proposed change deletes the requirement for the Plant Review Board (PRB) to submit changes in the Security Plan, Emergency Plan, and Fire Protection Program (and implementing procedures) to the Safety Review Board (SRB). This proposed change affects Unit 1 and Unit 2 Specification 6.5.1.6, Responsibilities, items i, j, and n. Changes are proposed to Unit 1 and Unit 2 TS section 6.5.1. Specifically, a proposed change to section 6.5.1.1 makes the PRB an advisory council of the General Manager-Nuclear Plant, rather than the Plant Manager. The proposed change also requires the General Manager-Nuclear Plant, rather than the Plant Manager, to designate the PRB membership (TS 6.5.1.2); request special procedure reviews, investigations, etc. (TS 6.5.1.6.a and 6.5.1.6.h); and receive reports from the PRB on unplanned onsite releases of radioactive material per TS 6.5.1.6.k. The PRB authority is also modified to require recommendations, per TS 6.5.1.7.a, be forwarded to the General Manager-Nuclear Plant, rather than the Plant Manager. The General Manager-Nuclear Plant will now have overall responsibility for resolving disagreements between the PRB and upper plant management (TS 6.5.1.7.c).

Basis for Proposed Change 3:

This proposed change makes PRB responsibilities described in Unit 1 and Unit 2 Specification 6.5.1.6 consistent with SRB review responsibilities described in Unit 1 and Unit 2 Specification 6.5.2.7, because SRB review responsibilities do not include changes to the Security Plan, Emergency Plan, Fire Protection Program, and the associated implementing procedures. Such a review is not necessary, since adequate technical review is provided by onsite and corporate departments, and the PRB. We have also reviewed ANSI-3.2/N18.7-1976 section 4.3 which discusses the responsibility of the "Independent Review Program". The specific responsibilities of the independent review body, such as our SRB, do not include review of changes

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:  
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BASIS FOR CHANGE REQUEST

to the Security Plan, Emergency Plan, or Fire Protection Program, nor is the PRB required to submit these changes to the SRB. The SRB will retain its audit responsibilities for the Emergency Plan, Security Plan, Fire Protection Program, and the associated implementing procedures per Unit 1 and Unit 2 TS 6.5.2.8.e, f, and h.

This proposed change also makes the PRB an advisory council of the General Manager-Nuclear Plant, rather than the Plant Manager. The General Manager-Nuclear Plant is a position of higher authority than the Plant Manager. Therefore, this proposed change elevates PRB authority by giving the opportunity and responsibility to provide input to a higher level of management.

PROPOSED CHANGE 4:

This proposed change shifts the responsibility for the Radiological Environmental Monitoring Program and its implementing procedures (Unit 1 and Unit 2 TS 6.1.2 and 6.8.4) from the Manager-Radiological Safety to the General Manager-Nuclear Plant or his designee.

Basis for Proposed Change 4:

The Radiological Environmental Monitoring Program was controlled by the Corporate Manager of Radiological Safety. This corporate position no longer exists within Georgia Power Company. As an interim step, this control now rests with the Manager Environmental Services, under the Regulatory Engineering and Environmental Services Department of Southern Company Services (SCS) SONOPCO Project. The functions remain unchanged. It is appropriate for the responsibility of this function to rest with the General Manager-Nuclear Plant since activities associated with the Radiological Environmental Monitoring Program are under the control of the site.

ENCLOSURE 2

PLANT HATCH - UNITS 1, 2  
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OPERATING LICENSES DPR-57, NPF-5  
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:  
CORPORATE AND ONSITE ORGANIZATION

10 CFR 50.92 EVALUATION

PROPOSED CHANGE 1:

This change revises the administrative controls in the TS and ETS to reflect changes in the company organization. Specifically, Unit 1 and Unit 2 TS sections 6.1, 6.2, and 6.8, and ETS section 5.0 reflect a change in titles for the Plant Manager and Plant Support Manager. The Plant Manager's new title is Assistant General Manager-Plant Operations, and the Plant Support Manager's new title is Assistant General Manager-Plant Support. Also, in section 6.4, the Code of Federal Regulations reference for the unit staff training/retraining programs was changed from Appendix A of Part 55 to 10 CFR 55.

Basis for Proposed Change 1:

Georgia Power Company has reviewed this proposed change and determined it does not involve a significant hazards consideration based on the following:

1. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated. The change is administrative in nature and involves no physical alteration of the plant or changes to setpoints or operating parameters. The change does not affect operation, maintenance, or testing of the plant. For these reasons, the response of the plant to previously evaluated accidents will remain unchanged.
2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. Since no change is being made to the design, operation, maintenance, or testing of the plant, a new mode of failure is not created. Therefore, a new or different kind of accident will not occur as the result of this change.
3. The proposed change does not significantly reduce a margin of safety. The title changes discussed above do not reduce the level of management oversight of activities affecting safety. The organizational structure necessary for safe plant operation will continue to be maintained. Also, the CFR reference change reflects the fact that Part 55 does not contain an Appendix A; Part 55 addresses requirements for operator licenses in Subparts A through H. Therefore, adding an appropriate reference and modifying the administrative controls section to reflect new managerial titles will not reduce the margins of safety.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:  
CORPORATE AND ONSITE ORGANIZATION

10 CFR 50.92 EVALUATION

PROPOSED CHANGE 2:

Organizational changes have resulted in the retitling of the General Manager-Quality Assurance to Manager-Safety Audit and Engineering Review. The ETS of both units have been revised to reflect this change in the Table of Contents, and sections 5.1 and 5.3. Also, Specification 6.2.2.h was revised to state "plant operators shall hold a reactor operator license" instead of "plant operators and assistant plant operators shall hold a reactor license." In addition, the titles of plant personnel required to hold senior reactor operator licenses have been modified to reflect the current plant organization. Finally, an editorial revision to sections 6.9.1 and 6.9.2 is also proposed to change the Regional Office of Inspection and Enforcement to the NRC Regional Office.

Basis For Proposed Change 2:

Georgia Power Company has reviewed the proposed change and determined it does not involve a significant hazards consideration based on the following.

1. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated. The change is administrative in nature and involves no physical alteration of the plant or changes to setpoints or operating parameters. The change does not affect operation, maintenance, or testing of the plant. For these reasons, the response of the plant to previously evaluated accidents will remain unchanged, and the probability of such an accident occurring is not increased.
2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. Since no change is being made to the design, operation, maintenance, or testing of the plant, a new mode of failure is not created. Therefore, a new or different kind of accident will not occur as the result of this change.
3. The proposed change does not significantly reduce a margin of safety. The title change to MSAER does not affect the overall effectiveness of the QA program at Plant Hatch. The MSAER still has direct access to levels of management where appropriate action can be accomplished. Also, not requiring assistant plant operators to hold licenses or changing the title of individuals who hold senior operator licenses

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:  
CORPORATE AND ONSITE ORGANIZATION

10 CFR 50.92 EVALUATION

will not reduce safety margins, since any individual who manipulates controls at Plant Hatch will continue to be licensed pursuant to 10 CFR 55, Subpart A. Therefore, this proposed change will not significantly reduce a margin of safety.

PROPOSED CHANGE 3:

This proposed change deletes the requirement for the PRB to submit changes in the Security Plan, Emergency Plan, and Fire Protection Program (and implementing procedures) to the SRB. This proposed change affects Unit 1 and Unit 2 Specification 6.5.1.6, items i, j, and n. A change is also proposed to Unit 1 and Unit 2 Specifications 6.5.1.1, which would make the PRB an advisory council of the General Manager-Nuclear Plant, rather than the Plant Manager. The proposed change also requires the General Manager-Nuclear Plant, rather than the Plant Manager, designate the PRB membership (TS 6.5.1.2); request special procedure reviews, investigations, etc. (TS 6.5.1.6.a and 6.5.1.6.h); and receive reports from the PRB on unplanned onsite releases of radioactive material per TS 6.5.1.6.k. The PRB authority is also modified to require recommendations, per TS 6.5.1.7.a, be forwarded to the General Manager Nuclear Plant, rather than the Plant Manager. The General Manager-Nuclear Plant will now have overall responsibility for resolving disagreements between the PRB and upper plant management (TS 6.5.1.7.c).

Basis for Proposed Change 3:

Georgia Power Company has reviewed the proposed change and determined it does not involve a significant hazards consideration based on the following:

1. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated. The change is administrative in nature and involves no physical alteration of the plant or changes to setpoints or operating parameters. The change does not affect operation, maintenance, or testing of the plant. For these reasons, the response of the plant to previously evaluated accidents, and the probability of having such accidents, will remain unchanged.
2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. Since no change is being made to the design, operation, maintenance, or testing of the plant, a new mode of failure is not created. Therefore, a new or different kind of accident will not occur as the result of this change.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:  
CORPORATE AND ONSITE ORGANIZATION

10 CFR 50.92 EVALUATION

3. The proposed change does not significantly reduce a margin of safety. The SRB responsibilities for review do not include the Security Plan, Emergency Plan, and Fire Protection Program, because adequate technical review is provided by onsite and corporate departments, and the PRB. The SRB will continue to have auditing responsibilities for the aforementioned plans/program. The proposed change to require the PRB to report to the General Manager-Nuclear Plant, rather than the Plant Manager, is a conservative change which gives the PRB the opportunity and responsibility to provide input to a higher level of management. Therefore, this change will not reduce a margin of safety.

PROPOSED CHANGE 4:

This proposed change shifts the responsibility for the Radiological Environmental Monitoring Program and its implementing procedures (Unit 1 and Unit 2 TS 6.1.2 and 6.8.4) from the Manager Radiological Safety to the General Manager-Nuclear Plant or his designee.

Basis for Proposed Change 4:

Georgia Power Company has reviewed the proposed change and determined it does not involve a significant hazards consideration based on the following:

1. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated. The change is administrative in nature and involves no physical alteration of the plant or changes to setpoints or operating parameters. The change does not affect operation, maintenance, or testing of the plant. For these reasons, the response of the plant to previously evaluated accidents, and the probability of having such an accident, will remain unchanged.
2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. Since no change is being made to the design, operation, maintenance, or testing of the plant, a new mode of failure is not created. Therefore, a new or different kind of accident will not occur as the result of this change.
3. The proposed change does not significantly reduce a margin of safety. The title change discussed above does not reduce the level of management oversight for the Radiological Environmental Monitoring Program and its implementing procedures. Therefore, margins of safety will not be affected by this administrative change.

ENCLOSURE 3

PLANT HATCH - UNITS 1, 2  
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PAGE CHANGE INSTRUCTIONS

The proposed changes to the Plant Hatch Units 1 and 2 Technical Specifications and Environmental Technical Specifications (Appendices A and B, respectively, to Operating Licenses DPR-57 and NPF-5) will be incorporated as follows:

	<u>Page</u>	<u>Instruction</u>
Unit 1:	6-1	Replace
	6-3	Replace
	6-6	Replace
	6-7	Replace
	6-8	Replace
	6-13	Replace
	6-13a	Replace
	6-14	Replace
	6-18	Replace
	i (ETS)	Replace
	iii (ETS)	Delete
	5-1 (ETS)	Replace
	5-3 (ETS)	Replace
	5-5 (ETS)	Replace
Unit 2:	6-1	Replace
	6-3	Replace
	6-5	Replace
	6-6	Replace
	6-7	Replace
	6-12	Replace
	6-12a	Replace
	6-13	Replace
	6-17	Replace
	i (ETS)	Replace
	iii (ETS)	Delete
	5-1 (ETS)	Replace
	5-3 (ETS)	Replace
	5-5 (ETS)	Replace