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The Southern Electric System

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

January 25, 1991

ELV-02388
0772

Docket Nos. 50-424
50-425

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATION 6.4.1.2

In accordance with the provisions of 10 CFR 50.90 and 10 CFR 50.69, Georgia Power Company (GPC) hereby proposes to amend the Vogtle Electric Generating Plant (VEGP) Units 1 and 2 Technical Specifications, Appendix A to Operating Licenses NPF-68 and NPF-81.

The proposed revision to the Technical Specifications will revise the composition of the Plant Review Board (PRB) by adding the Technical Support department in place of the Quality Control and the Nuclear Safety and Compliance departments. This change reflects recent upgrading of the PRB membership such that department managers replaced supervisors as PRB members. Since the Quality Control and Nuclear Safety and Compliance departments report to the Manager of Technical Support, this change provides a more accurate description of the PRB composition.

The proposed change and its basis are described in Enclosure 1. An evaluation pursuant to 10 CFR 50.92 showing that the proposed change does not involve significant hazards consideration is provided as Enclosure 2. Instructions for incorporation of the proposed change into the Technical Specifications and a mark-up of the affected page is provided as Enclosure 3.

In accordance with 10 CFR 50.91, the designated state official will be sent a copy of this letter and all enclosures.

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

GEORGIA POWER COMPANY

By: W. G. Hairston, III
W. G. Hairston, III

Sworn to and subscribed before me this 25th day of January, 1991.

Debra Marino
Notary Public

WGH, III/HWM/gm

MY COMMISSION EXPIRES JAN. 2, 1994

Enclosures:

1. Basis for Proposed Change
2. 10 CFR 50.92 Evaluation
3. Instructions for Incorporation and Revised Pages

c(w): Georgia Power Company
Mr. C. K. McCoy
Mr. W. B. Shipman
Mr. P. D. Rushton
Mr. R. M. Odom
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebner, Regional Administrator
Mr. D. S. Hood, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

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

ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATION 6.4.1.2

BASIS FOR PROPOSED CHANGE

Proposed Change

Section 6.4.1.2 identifies the departments that may supply supervisory personnel to the Plant Review Board (PRB). This revision will delete the Quality Control (QC) and the Nuclear Safety and Compliance (NSAC) departments and replace them with the Technical Support department.

Basis

The PRB advises the General Manager - Nuclear Plant on matters related to nuclear safety. In order to upgrade the PRB membership GPC decided to replace supervisors with department managers as PRB members. This change merely reflects the fact that the Technical Support Department includes both QC and NSAC. The effect of this change is that the Technical Support Manager is clearly identified as a PRB member. This provides a consistent indication of how the PRB is staffed.

ENCLOSURE 2

VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATION 6.4.1.2

10 CFR 50.92 EVALUATION

Pursuant to 10 CFR 50.92 Georgia Power Company (GPC) has evaluated the proposed amendment and has determined that operation of the facility in accordance with the proposed amendment would not involve significant hazards considerations.

Background

The current Technical Specification states that the PRB shall be composed of Department Superintendents or Managers, or supervisory personnel who report directly to Department Superintendents or Managers from Operations, Maintenance, Quality Control (QC), Health Physics, Nuclear Safety and Compliance (NSAC) and Engineering Support. In order to raise the level of management represented on the PRB, it was upgraded such that department managers replaced supervisors as PRB members. The Supervisor of NSAC and the Supervisor of QC report to the Manager of Technical Support. It has been determined that the current Technical Specification is met by using the Manager of Technical Support to represent QC and NSAC. The Manager of Technical Support is not specifically listed in Specification 6.4.1.2. In order to avoid the appearance of deviation from the Technical Specifications GPC is requesting that the Technical Specification be revised to replace the Supervisors of QC and NSAC with the Manager of Technical Support.

Analysis

Since the supervisors of QC and NSAC report directly to the Manager of Technical Support the use of the Manager of Technical Support on the PRB has been determined to be an improvement. Therefore, the change to the Technical Specification does not significantly alter the current Technical Specification requirement. The change does not reduce the qualifications for membership on the PRB. In addition, it does not alter the function of the PRB or the manner by which it fulfills its functional requirements. Therefore, this change to the Technical Specifications will not result in a decrease in the ability of the PRB to perform its safety function. The current quorum requirements do not require that both the QC and NSAC members be present at PRB meetings. Having the Manager of Technical Support as a member of the PRB will allow this manager to represent both QC and NSAC.

ENCLOSURE 2 (CONTINUED)

REQUEST TO REVISE TECHNICAL SPECIFICATION 6.4.1.2

Conclusion

Based on the above considerations GPC has concluded the following concerning the requirements of 10 CFR 50.92.

1. The revised description of the PRB composition does not increase the probability or consequences of accidents previously evaluated in the FSAR because the make-up of the PRB does not directly affect any material condition of the plant that could directly contribute to causing or mitigating the effects of an accident. The change to the PRB composition will not diminish its ability to review plant activities. Therefore, this change will not diminish the PRB's role in reviewing changes that could affect the probability or consequences of accidents.
2. The revision to the composition requirements of the PRB does not create the possibility of a new or different kind of accident other than those already evaluated in the FSAR. Since no physical change is being made in the plant or its operating parameters it does not introduce the possibility of a new or different type of accident.
3. The margin of safety provided by the Technical Specification is not altered because the responsibilities, quorum, meeting frequency and functions of the PRB remain unchanged. The qualifications of the PRB members is unchanged. The composition of the PRB is upgraded. Therefore, the current level of safety, contributed by the PRB function will not be diminished by the proposed Technical Specification revision.

Based upon the preceding discussion GPC has concluded that the proposed revision to the Technical Specifications does not involve a significant hazards consideration as defined by 10 CFR 50.92 (c).