Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404-526-6526

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

L. T. Gucwa
Manager Nuclear Engineering
and Chief Nuclear Engineer

Georgia Power
the southern electric system

NED-84-152

March 30, 1984

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
101 Marietta Street, NW
Atlanta, Georgia 30303

REFERENCE:
RII: JPO
50-321/50-366
IER 321/84-02
366/84-02

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

The following information is submitted in response to Inspection Report 50-321/84-02 and 50-366/84-02 conducted by Mr. R. R. Martston of your office on January 16-20, 1984.

VIOLATION A:

10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirements of Appendix E to 10 CFR Part 50 and the planning standards of 50.47(b). 10 CFR 50.47(b)(15) requires that those who may be called on to assist in an emergency be provided radiological emergency response training. Section J of the Hatch Nuclear Plant Emergency Plan states in part that it is the responsibility of the Emergency Director to recommend actions to the state agencies to protect the public. Section B of the Plan states that the Operations Supervisor initially takes charge of the emergency control measures by assuming the position of Emergency Director.

Contrary to the above, Operations Supervisors interviewed during the inspection were not adequately trained in that they were not capable of determining when and what type of protective action recommendations should be considered to protect health and safety.

This is a Severity Level IV (Supplement 1).

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RESPONSE TO VIOLATION A:

Admission or denial of the alleged violation: The violation occurred.

Reason for Violation: In response to Information Notice 83-28, procedures addressing protective action recommendations (HNP-4854) were revised. While training in the use of the modified procedure was conducted for management staff, an oversight resulted in this training not being administered to shift control room staff.

Corrective steps which have been taken and results achieved: Training outlines for control room staff addressing the Protective Action Recommendation procedure have been developed.

Corrective steps which will be taken to avoid Further violations: The training outline will be modified to incorporate further changes in HNP-4854 (ref. Violation B.) Training for Operations Supervisors will be scheduled to be completed before May 20, 1984.

Date when full compliance will be achieved: Full compliance will be achieved when training is completed (no later than May 20, 1984).

VIOLATION B:

10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirements of Appendix E to 10 CFR Part 50 and the planning standards of 50.47(b). 10 CFR 50.47(b)(10) requires that the licensee's emergency plans shall include a range of protective actions consistent with Federal Guidance, for the plume exposure pathway EPZ for emergency workers and the public.

The Federal Guidance on protective actions to be recommended to offsite officials for general emergencies is addressed in Appendix 1 of NUREG-0654/FEMA-REP-1, Rev. 1, entitled "Criteria for Preparation and Evaluation of Radiological Emergency Preparedness in Support of Nuclear Power Plants". This guidance is clarified by IE Information Notice No. 83-28: "Criteria for Protective Action Recommendations for General Emergencies".

Contary to the above, the licensee has failed to incorporate the above guidance in the Implementing Procedures in that no provisions is made for a protective action recommendation upon initial declaration of a

VIOLATION B (Continued)

General Emergency. In addition, where guidance specifies evacuation for 5 miles in all directions and 10 miles downwind, the licensee's procedure specifies evacuation for 3 miles in all directions and 10 miles downwind.

This is a Severity Level IV Violation (Supplement 1) and applicable to all units.

RESPONSE TO VIOLATION B:

Admission or denial of the alleged violation: The violation occurred.

Reason for the violation: The violation resulted from an error in the emergency planning staff's interpretation and implementation of the referenced guidance information.

Corrective steps which have been taken and results achieved: Procedure HNP-4854, "Protective Action Guidelines to State & Local Authorities" has been corrected to specify a shelter recommendation promptly following a declaration of a General Emergency. In addition the 3 mile evacuation recommendation has been changed to 5 miles per the referenced guidance.

Corrective steps which will be taken to avoid further violations: No additional steps are needed or planned.

Date when full compliance will be achieved: Full compliance was achieved on March 30, 1984 when the HNP-4854 revisions were implemented.

Very truly yours,

William E. Burn /for

L. T. Gucwa

SCE/mb

xc: J. T. Beckham, Jr.
H. C. Nix, Jr.
Senior Resident Inspector