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Georgia Power

the southern electric system

NED-84-265

May 25, 1984

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz, Chief
Operating Reactors Branch No. 4
Division of Licensing
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
10 CFR 50.48 AND APPENDIX R IMPLEMENTATION SCHEDULE

Gentlemen:

By your letter dated April 18, 1984, approval of those exemptions from 10 CFR 50 Appendix R requested by Georgia Power Company (GPC) was granted. With that approval, the tolling of the schedule requirements of 10 CFR 50.48(c) provided by subparagraph (c) (6) was terminated.

Yet to be addressed is our requested extension in the implementation schedule as defined in 10 CFR 50.48(c). This requested extension was first discussed in our March 19, 1981 letter and more precisely defined in our July 1, 1982 Appendix R submittal (as amended). Information to support the modification schedule exemption request was submitted by (1) our letter dated June 14, 1983, (2) discussed during a November 30, 1983 meeting between GPC and members of the NRC staff, and (3) by our letter dated January 24, 1984. Subsequent to the submittal of this information, on March 16, 1984, we received additional "Guidance on Interim Measures to Support Scheduler Exemption Requests" via telecopy from the NRC Licensing Project Manager. This guidance was discussed in a conference call between Mr. Rivenbark, Mr. Wambach, Mr. Kubicki, et. al. of the NRC staff and representatives of GPC and its consultants. It is our understanding that in order for our requested extension to the implementation schedule described in 10 CFR 50.48 to be granted, the guidance referenced above must be met.

Pursuant to this requirement, GPC hereby commits to meet on a fire area-by-fire area basis either items 1 or 2, and item 3 below for the period of time from expiration of the 10 CFR 50.48 schedule allowance until the specific fire area is in compliance with paragraphs III G.2 and III G.3 of 10 CFR 50 Appendix R as modified by the exemptions granted by the NRC's letter of April 18, 1984. Specifically, these items are:

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1. GPC will identify for each fire area not in compliance with III G.2 and III G.3, interim shutdown procedures to compensate for the loss of the unprotected shutdown systems in the fire area; or
2. Should such interim procedures not be developed for any fire area, interim fire protection will be provided based on the following guidelines:
 - a. a continuous fire watch (in certain fire areas a roving fire watch may be used contingent upon NRC approval on a case-by-case basis at the time of establishment of the watch), or
 - b. temporary fire barriers to protect those shutdown systems which are vulnerable to damage due to noncompliance with III G.2 and III G.3, or
 - c. a temporary automatic fire suppression system to protect the shutdown systems which are vulnerable to damage due to noncompliance with III G.2 and III G.3; and
3. Interim shutdown procedures will be developed for the control room should it not be in compliance with III G.2 and III G.3.

With this commitment, we request that our requested exemption to 10 CFR 50.48 be granted so that implementation can proceed in the timely and orderly manner described by our previous correspondence. Your earliest attention to this request will be greatly appreciated.

Very truly yours,

L. T. Gucwa

L. T. Gucwa

WEB/mb

xc: J. T. Beckham, Jr.
H. C. Nix, Jr.
J. P. O'Reilly (NRC- Region II)
Senior Resident Inspector