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J. T. Beckham, Jr.
Vice President and General Manager
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NED-84-462

September 17, 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 DOCKET 50-321
OPERATING LICENSE DPR-57
EDWIN I. HATCH NUCLEAR PLANT UNIT 1
REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE

Gentlemen:

In accordance with the provisions of 10 CFR 50.90, as required by 10 CFR 50.59(c)(1), Georgia Power Company hereby proposes an amendment to the Technical Specifications (Appendix A to the Operating License) for Plant Hatch Unit 1. These proposed changes will:

- 1) allow up to four bundles to be loaded in their previous positions around a Source Range Monitor in order to establish the required three counts per second;
- 2) delete the description of control rod material to provide for the use of improved hydrid control rod assemblies; and
- 3) revise the definition of CORE ALTERATION to clarify that the definition applies only with fuel in the vessel.

The Plant Review Board and Safety Review Board have reviewed these proposed changes to the Unit 1 Technical Specifications (Attachment 1) and have concluded that the proposed changes do not involve an unreviewed safety question. Also, the proposed changes have been evaluated and determined not to involve a significant hazards considerations. Enclosed (Attachment 2) is a technical discussion and significant hazards evaluation.

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The proposed changes to the Technical Specifications requested by item 1 above do not increase the probability of occurrence or consequences of a previously analyzed accident or malfunction of equipment important to safety because spent fuel studies (reference: GESSAR, NEDO-10741, Chapters 4 and 9) demonstrate inadvertent criticality with 4 bundles is not possible. Further, the same subcritical assemblies and arrangement that was discharged is returned to the same core location. The possibility of occurrence of an accident different than any evaluated in the FSAR is not created because there is no design change to any plant systems. Finally, the safety margin is not reduced because the bundles remain considerably subcritical. Consequently, this change does not represent an unreviewed safety question.

The proposed changes to the Technical Specifications requested by item 2 above do not increase the probability of occurrence or consequences of a previously analyzed accident or malfunction of equipment important to safety because the control rod worth of the Hybrid I Control Blades (HICR) is the same as the existing design and because existing methodology for transient and accident analysis remains valid with the HICR assemblies installed. The possibility of occurrence of an accident different than any evaluated in the FSAR is not created by the use of the HICR assemblies, because there is no functional change in the control rods. Finally, because HICR weight, rod worth, scram speed and scram reactivity are the same as control rods currently in use, safety margins specified in Technical Specifications are not reduced. Consequently, this change does not represent an unreviewed safety question.

Because the proposed changes to Technical Specifications requested by item 3 above only revise a definition in order to clarify what constitutes a CORE ALTERATION, the changes do not increase the probability or consequences of a previously analyzed accident, do not create a different type accident, nor are safety margins specified in Technical Specifications changed. Consequently, this administrative change does not constitute an unreviewed safety question.

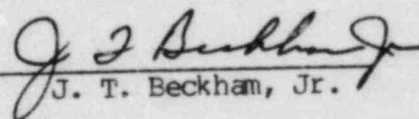
Pursuant to 10 CFR 170.21, a check for the amendment application of \$150.00 is enclosed.

Pursuant to the requirements of 10 CFR 50.92, J. L. Ledbetter of the Georgia Department of Natural Resources will be sent a copy of this letter and all applicable attachments.

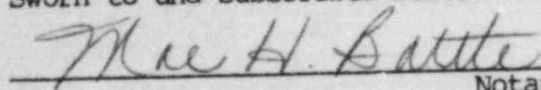
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J. T. Beckham, Jr. states that he is Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that to the best of his knowledge and belief the facts set forth in this letter are true.

GEORGIA POWER COMPANY

By: 
J. T. Beckham, Jr.

^{17 mb}
Sworn to and subscribed before me this 14th day of September, 1984.



Notary Public, Georgia, State at Large
My Commission Expires Sept. 18, 1987

Notary Public

DLT/mb

Enclosure

xc: H. C. Nix, Jr.
Senior Resident Inspector
J. P. O'Reilly, (NRC-Region II)
J. L. Ledbetter