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HL-2404
003965

September 18, 1992

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

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
UPDATED RESPONSE TO GENERIC LETTER 88-20, SUPPLEMENT 4
NRC TAC NOS. M74419, M74420

Gentlemen:

By letter dated December 23, 1991, Georgia Power Company (GPC) submitted a response to Generic Letter 88-20, Supplement 4, "Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities." GPC's response described the proposed program for completing the IPEEE Evaluation for the Edwin I. Hatch Nuclear Plant (HNP). However, the schedule for the Unit 1 and Unit 2 seismic IPEEE evaluations was not provided as the NRC staff had not issued the Supplemental Safety Evaluation Report (SSER) approving the USI A-46 generic implementation procedure (GIP). GPC is coordinating the IPEEE Seismic Evaluation with the USI A-46 program.

On May 22, 1992, the NRC staff issued the SSER, via Supplement 1 to Generic Letter 87-02. By letter dated July 1, 1992, the NRC staff requested GPC to provide the projected milestones and schedules associated with the seismic IPEEE by September 18, 1992. The NRC staff also indicated that the submittal schedule for the remainder of the IPEEE program is not consistent with the NRC's requested date of June, 1994. GPC was requested to submit a justification for the acceptability of the schedule and further requested that the IPEEE submittal be provided no later than June, 1995.

In response, the enclosure to this letter provides a list of milestones and a proposed completion schedule for the IPEEE Seismic Evaluation. This schedule is contingent upon a timely NRC staff approval of the in-structure response spectra, required to be submitted in GPC's response to Generic Letter 87-02, Supplement 1. It should be noted that this response spectra was utilized in the Unit 1 Seismic Margins Assessment submitted on July 20, 1990. The Unit 1 Seismic Margins Assessment was extensively reviewed by the NRC and NRC contractors and was subsequently approved. If approval of the proposed in-structure response spectra is not received by November 17, 1992, as specified in GL 87-02, Supplement 1, the IPEEE

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Seismic Evaluation completion date will be rescheduled to permit coordination with the technical resolution to USI A-46 under Generic Letter 87-02, Supplement 1. Additionally, in consideration of the Commission's goal of closing severe accident issues by June, 1995, GPC has revised the schedules for the remainder of the IPEEE program such that the IPEEE submittal will be provided by June, 1995. These revised schedules are also provided in the enclosure. Further, a clarification regarding a subsequent submittal of the Unit 1 Seismic Margins Evaluation is provided in the enclosure.

Should you have any questions in this regard, please contact this office.

Sincerely,


J. T. Beckham, Jr.

JKB/cr
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Enclosures

cc: Georgia Power Company
Mr. H. L. Sumner, General Manager - Nuclear Plant
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. K. Jabbour, 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

ENCLOSURE

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES LR-17, NPF-5
UPDATED RESPONSE TO GENERIC LET ER 88-20, SUPPLEMENT 4
NRC TAC NOS. M74419, M74420

IPEEE MILESTONES AND REVISED SCHEDULE

The proposed milestones and schedule for performing each section of the IPEEE are provided below:

SEISMIC EVENTS

As previously stated in GPC letter dated December 23, 1991, the Seismic Margins Assessment for IPEEE has been completed for Unit 1. The Unit 2 Seismic Margins Assessment will be expanded to include the evaluation of potential early failure of containment functions to satisfy the NUREG guidance on containment performance. As the Unit 1 evaluation was previously submitted on July 20, 1990, and the NRC staff has stated concurrence with the evaluation results, a resubmittal in its entirety is not considered necessary. GPC will submit the results of the evaluation of potential early failure of containment function concurrent with submittal of the Unit 2 Seismic Margins Assessment. A list of projected milestones and a completion schedule for the seismic events portion of the HNP IPEEE program are provided as follows:

<u>Task Description</u>	<u>Completion Dates</u>
Containment Performance Walkdown and Evaluation	12/15/93
Unit 2 Seismic Margins Evaluation	12/15/94
Submit Unit 2 Report and Results of Unit 1 Containment Evaluation	6/1/95

ENCLOSURE (Continued)

NRC TAC NOS. M74419, M74420

IPEEE MILESTONES AND REVISED SCHEDULE

INTERNAL FIRES

The following table provides a list of projected milestones and a completion schedule for the internal fire portion of the HNP IPEEE:

<u>Task Description</u>	<u>Completion Dates</u>
Perform initial screening	10/31/93
Perform final CDF quantification	10/31/94
Evaluate and plan for resolution of IPEEE findings	3/1/95
Report to NRC	6/1/95

HIGH WINDS, FLOODS, AND TRANSPORTATION AND NEARBY FACILITY ACCIDENTS

The following table provides a list of milestones and a completion schedule for the other events portion of the HNP IPEEE:

<u>Task Description</u>	<u>Completion Dates</u>
Perform initial review of licensing basis	6/30/93
Compare against 1975 SRP criteria	10/31/93
Evaluate and plan for resolution of IPEEE findings	3/1/95
Report to NRC	6/1/95

The completion schedule provided above extends the submittal of the IPEEE results beyond the Generic Letter 88-20, Supplement 4 suggested submittal dated of June 1994. There are two primary reasons for proposing the extension.

GPC has expended considerable resources in assuring the seismic response capability for Plant Hatch Unit One. Considering the results of the Unit 1 Seismic Margins Assessment, we do not foresee any major vulnerabilities in Unit 2. Furthermore, the delay in issuance of a generic SER for the SQUG GIP will delay our completion of the remaining USI-A46 issues for both units.

ENCLOSURE (Continued)

NRC TAC NOS. M74419, M74420

IPEEE MILESTONES AND REVISED SCHEDULE

Additionally, the HNP internal events IPE is being performed with an extensive in-house staff participation and will not be complete until December 1992. This same staff will be primarily responsible for the planning and completion of the IPEEE, and their availability will affect the status of the IPEEE. Thus, GPC believes submission of the IPEEE results by June 1995 is reasonable, and this schedule presents no undue risk to public health and safety.