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The Southern Electric System

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September 21, 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
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS
IN ACCORDANCE WITH GENERIC LETTER 89-01

Gentlemen:

In accordance with the provisions of 10 CFR 50.90, as required by 10 CFR 50.59(c)(1), Georgia Power Company (GPC) hereby proposes a change to the Plant Hatch Units 1 and 2 Technical Specifications (TS), Appendix A to Operating Licenses DPR-57 and NPF-5.

On January 31, 1989, the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications into the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of Radiological Effluent Technical Specifications to the Offsite Dose Calculation Manual or to the Process Control Program." In GL 89-01, the NRC encouraged licensees to submit proposed changes to their plant TS which would relocate procedural details on radioactive effluents and radiological environmental monitoring to the Offsite Dose Calculation Manual (ODCM), and relocate procedural details on solid radioactive wastes to the Process Control Program (PCP). Such action would simplify the Radiological Effluent Technical Specifications (RETS), meet the regulatory requirements for radioactive effluents and radiological environmental monitoring, and would be categorized as a line-item improvement to the TS consistent with the Commission's Interim Policy Statement on Technical Specification Improvements.

GPC has reviewed the recommendations of GL 89-01 and has elected to implement the guidance contained therein to prepare proposed changes to the Plant Hatch Unit 1 and Unit 2 TS.

This TS change request will (1) incorporate programmatic controls in the Administrative Controls section of the TS which satisfy the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a and Appendix I to 10 CFR Part 50, (2) relocate the existing procedural details in current TS involving radioactive effluent monitoring instrumentation, the control of liquid and gaseous effluents, equipment requirements for

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liquid and gaseous effluents, radiological environmental monitoring, and radiological reporting details from the TS to the ODCM, (3) relocate the definition of solidification and existing procedural details in the current TS on solid radioactive wastes to the PCP, (4) simplify the associated reporting requirements, (5) simplify the administrative controls for changes to the ODCM and PCP, (6) add record retention requirements for changes to the ODCM and PCP, (7) update the definitions of the ODCM and PCP consistent with these changes, (8) relocate definitions from the TS to the ODCM and PCP as appropriate, consistent with these changes, and (9) incorporate terminology changes into the procedural details transferred from the TS to the ODCM and PCP in order to facilitate the implementation of GI 89-01.

The revised ODCM and PCP have been prepared in accordance with the proposed changes to the Administrative Controls section of the TS so that their implementation can be coordinated with that of the proposed amendment, once issued.

Enclosure 1 provides the RETS cross-reference table which describes the disposition of the affected TS sections.

Enclosure 2 details the basis for our determination the proposed change does not involve a significant hazards consideration.

Enclosure 3 provides page change instructions for incorporating the proposed change. Following Enclosure 3 are the proposed TS pages and the associated markups of the existing pages. Also following Enclosure 3 are copies of the proposed ODCM pages, which are to be revised due to this change, and a complete copy of the proposed PCP.

To allow time for procedure revisions and orderly incorporation into copies of the TS, GPC requests the proposed amendment, once approved by the NRC, be issued with an effective date to be no later than 60 days from the date of issuance of the amendment.

In accordance with the requirements of 10 CFR 50.91, a copy of this letter and all applicable enclosures will be sent to the designated State official of the Environmental Protection Division of the Georgia Department of Natural Resources.

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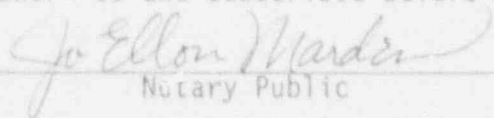
Mr. J. T. Beckham, Jr. states he is duly authorized to execute this oath on behalf of Georgia Power Company, and to the best of his knowledge and belief, the facts set forth in this letter are true.

GEORGIA POWER COMPANY

BY:


J. T. Beckham, Jr.

Sworn to and subscribed before me this 17th day of September 1992.


Notary Public

MCM/cr MY COMMISSION EXPIRES JUNE 30, 1996
003917

Enclosures

1. RETS Cross-reference Table
2. 10 CFR 50.92 Evaluation
3. Page Change Instructions

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

State of Georgia
Mr. J. D. Tanner, Commissioner - Department of Natural Resources

ENCLOSURE 1

PLANT HATCH - UNITS 1, 2
 NRC DOCKETS 50-321, 50-366
 OPERATING LICENSE DPR-57, NPF-5
 REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
 RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS
IN ACCORDANCE WITH GENERIC LETTER 89-01

RETS CROSS-REFERENCE TABLE*

<u>GL 89-01 TS REFERENCE</u>	<u>HNP TS REFERENCE</u>	<u>HNP TS TITLE</u>	<u>DISPOSITION OF EXISTING HNP TS</u>
1.17	Sec 1.0, XX, (U1) Sec 1.0 (U2)	OFFSITE DOSE CALCULATION MANUAL (ODCM)	Definition updated to reflect change in ODCM scope.
1.22	Sec 1.0, VV (U1) Sec 1.0 (U2)	PROCESS CONTROL PROGRAM	Definition updated to reflect change in PCP scope and revised to clarify content of PCP.
1.32	Sec 1.0, WW (U1) Sec 1.0 (U2)	SOLIDIFICATION	Definition relocated to PCP, App A, A.1.3.
--	Sec 1.0, YY (U1) Sec 1.0, (U2)	GASEOUS RADWASTE TREATMENT SYSTEM	Definition relocated to ODCM, 7.1.1.
3/4.3.3.10	3/4.14.1 (U1) 3/4.3.6.9 (U2)	RADIOACTIVE LIQUID EFFLUENT INSTRUMENTATION	Programmatic controls included in PTS 6.18(1). TS procedural details relocated to ODCM, 1.7.1.

* See LEGEND on Sheet E1-6 for definition of abbreviated terms.

ENCLOSURE 1 (Continued)

RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS
IN ACCORDANCE WITH GENERIC LETTER 89-01

RCTS CROSS-REFERENCE TABLE

<u>GL 89-01 TS REFERENCE</u>	<u>HNP TS REFERENCE</u>	<u>HNP TS TITLE</u>	<u>DISPOSITION OF EXISTING HNP TS</u>
3/4.3.3.11	3/4.14.2 (U1) 3/4.3.6.10 (U2)	RADIOACTIVE GASEOUS EFFLUENT INSTRUMENTATION	Programmatic controls included in PTS 6.18(1). TS procedural details relocated to ODCM, 2.6.1. Requirements for explosive gas monitoring instrumentation retained in HNP TS.
3/4.11.1.1	3/4.15.1.1 (U1) 3/4.11.1.1 (U2)	LIQUID EFFLUENTS: CONCENTRATION	Programmatic controls included in PTS 6.18(2) & 6.18(3). TS procedural details relocated to ODCM, 1.7.2.
3/4.11.1.3	3/4.15.1.2 (U1)	LIQUID EFFLUENTS: DOSE	Programmatic controls included in PTS 6.18(4) & 6.18(5). TS procedural details relocated to ODCM, 1.7.3.
3/4.11.1.2	3/4.15.1.3 (U1) 3/4.11.1.3 (U2)	LIQUID EFFLUENTS: LIQUID WASTE TREATMENT	Programmatic controls included in PTS 6.18(6). TS procedural details relocated to ODCM, 1.7.4.
3/4.11.1.4	3/4.15.1.4 (U1) 3/4.11.1.4 (U2)	LIQUID HOLDUP TANKS	Existing requirements retained in HNP TS.
3/4.11.2.1	3/4.15.2.1 (U1) 3/4.11.2.1 (U2)	GASEOUS EFFLUENTS: DOSE RATE	Programmatic controls included in PTS 6.18(3) & 6.18(7). TS procedural details relocated to ODCM, 2.6.2.

ENCLOSURE 1 (Continued)

RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS
IN ACCORDANCE WITH GENERIC LETTER 89-01RETS CROSS-REFERENCE TABLE

<u>GL 89 01 TS REFERENCE</u>	<u>HNP TS REFERENCE</u>	<u>HNP TS TITLE</u>	<u>DISPOSITION OF EXISTING HNP TS</u>
3/4.11.2.2	3/4.15.2.2 (U1) 3/4.11.2.2 (U2)	GASEOUS EFFLUENTS: DOSE, NOBLE GASES	Programmatic controls included in PTS 6.18(5) & 6.18(8). TS procedural details relocated to ODCM, 2.6.3.
3/4.11.2.3	3/4.15.2.3 (U1) 3/4.11.2.3 (U2)	GASEOUS EFFLUENTS: RADIOIODINES, RADIOACTIVE MATERIAL IN PARTICULATE FORM, & RADIONUCLIDES OTHER THAN NOBLE GASES	Programmatic controls included in PTS 6.18(5) & 6.18(9). TS procedural details relocated to ODCM, 2.6.4.
3/4.11.2.4	3/4.15.2.4 (U1) 3/4.11.2.4 (U2)	GASEOUS EFFLUENTS: GASEOUS RADWASTE TREATMENT	Programmatic controls included in PTS 6.18(6). TS procedural details relocated to ODCM, 2.6.5.
3/4.11.2.5	3/4.15.2.6 (U1) 3/4.11.2.6 (U2)	EXPLOSIVE GAS MIXTURE	Existing requirements retained in HNP TS.
3/4.11.2.7	3/4.15.2.7 (U1) 3/4.15.2.7 (U2)	MAIN CONDENSER	Existing requirements retained in HNP TS. However, reference to TS 3.14.2 and 3.3.6.10 changed to reference ODCM.
3/4.11.3	3/4.15.3 (U1) 3/4.11.3 (U2)	RADIOACTIVE EFFLUENTS: SOLID RADIOACTIVE WASTE	Programmatic controls included in PTS 6.20. TS procedural details relocated to PCP, App A, A.3.

ENCLOSURE 1 (Continued)

RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS
IN ACCORDANCE WITH GENERIC LETTER 89-01

RETS CROSS-REFERENCE TABLE

<u>GL 89-01 TS REFERENCE</u>	<u>HNP TS REFERENCE</u>	<u>HNP TS TITLE</u>	<u>DISPOSITION OF EXISTING HNP TS</u>
3/4.11.4	3/4.15.2.5 (U1) 3/4.11.2.5 (U2)	RADIOACTIVE EFFLUENTS: TOTAL DOSE	Programmatic controls included in PTS 6.18(10). TS procedural details relocated to ODCM, 4.1.1.
3/4.12.1	3/4.16.1 (U1) (Also covers U2)	RADIOLOGICAL ENVIRONMENTAL MONITORING: MONITORING PROGRAM	Programmatic controls included in PTS 6.19(1). TS procedural details relocated to ODCM, 3.1.1.
3/4.12.2	3/4.16.2 (U1) (Also covers U2)	RADIOLOGICAL ENVIRONMENTAL MONITORING: LAND USE SURVEY	Programmatic controls included in PTS 6.19(2). TS procedural details relocated to ODCM, 3.1.2.
3/4.12.3	3/4.16.3 (U1) (Also covers U2)	RADIOLOGICAL ENVIRONMENTAL MONITORING: INTERLABORATORY COMPARISON PROGRAM	Programmatic controls included in PTS 6.19(3). TS procedural details relocated to ODCM, 3.1.3.
5.1.3	Fig. 3.15-1 (U1) Fig. 3.11-1 (U2)	UNRESTRICTED AREA BOUNDARY	Figure retained in TS. Map also duplicated in ODCM Figure 1.7-1 for convenience.
6.8.4.g	--	RADIOACTIVE EFFLUENTS CONTROL PROGRAM	Programmatic controls for radioactive effluents presented in PTS 6.18.
6.8.4.h	--	RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM	Programmatic controls for radioactive effluents presented in PTS 6.19.

ENCLOSURE 1 (Continued)

RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS
IN ACCORDANCE WITH GENERIC LETTER 89-01

RETS CROSS-REFERENCE TABLE

<u>GL 89-01 TS REFERENCE</u>	<u>HNP TS REFERENCE</u>	<u>HNP TS TITLE</u>	<u>DISPOSITION OF EXISTING HNP TS</u>
6.9.1.3	6.9.1.6 6.9.1.7 (U1, U2)	REPORTING REQUIREMENTS: ANNUAL RADIOLOGICAL ENVIRONMENTAL SURVEILLANCE REPORT	TS 6.9.1.6 updated to reflect change in GL 89-01, Enclosure 3, item 6.9.1.3. TS 6.9.1.7 deleted with reporting details relocated to ODCM, 6.1.
6.9.1.4	6.9.1.8 6.9.1.9 (U1, U2)	REPORTING REQUIREMENTS: SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT	TS 6.9.1.8 updated to reflect change in GL 89-01, Enclosure 3, item 6.9.1.4. TS 6.9.1.9 deleted with reporting details relocated to ODCM, 6.2. Reporting details pertaining to solid radwaste also included in PCP, App A, A.4.1.
6.10	6.10.2 (U1, U2)	RECORD RETENTION	Record retention requirements included in PTS 6.10.2.0 in accordance with GL 89-01, Enclosure 3, item 6.10.

ENCLOSURE 1 (Continued)

RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS
IN ACCORDANCE WITH GENERIC LETTER 89-01

RETS CROSS-REFERENCE TABLE

<u>GL 89-01 TS REFERENCE</u>	<u>HNP TS REFERENCE</u>	<u>HNP TS TITLE</u>	<u>DISPOSITION OF EXISTING HNP TS</u>
6.13	--	PROCESS CONTROL CONTROL PROGRAM (PCP)	GL 89-01 states programmatic requirements for PCP be retained in TS. However, GL 89-01 provides no guidance for incorporating programmatic controls pertaining to PCP into TS. TS 6.20 proposes to incorporate definition of PCP stated in GL 89-01 as program description for PCP. Also included in PTS 6.20 are requirements related to PCP changes in accordance with GL 89-01, Enclosure 3, item 6.13.
6.14	6.17 (U1, U2)	OFFSITE DOSE CALCULATION MANUAL (ODCM)	TS 6.17 requirements modified in accordance with GL 89-01, Enclosure 3, item 6.14.

LEGEND:

PCP = Process Control Program	U2 = Unit 2
TS = Technical Specification(s)	HNP = Hatch Nuclear Plant
PTS = Proposed Technical Specification(s)	GL = Generic Letter
U1 = Unit 1	

ENCLOSURE 2

PLANT HATCH - UNITS 1, 2
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10 CFR 50.92 EVALUATION

PROPOSED CHANGE:

The proposed changes to the Plant Hatch Unit 1 and Unit 2 Technical Specifications (TS) will implement the recommendations contained in Generic Letter (GL) 89-01. The proposed changes add new programmatic requirements governing radioactive effluents, radiological environmental monitoring, and solid radioactive wastes to the Administrative Controls Section of the TS. Procedural details contained in existing TS pertaining to radioactive effluents, radiological environmental monitoring, solid radioactive wastes, and associated reporting requirements are being relocated to the ODCM or the PCP, as appropriate. In addition, changes are proposed to other portions of the TS to accommodate the incorporation of GL 89-01. The details concerning these changes are provided in Enclosure 1.

BASIS FOR PROPOSED CHANGE:

By letter dated January 31, 1989, the Nuclear Regulatory Commission (NRC) issued GL 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications (RETS) in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual (ODCM) or to the Process Control Program (PCP)," and encouraged licensees to propose changes to their TS consistent with the guidance contained therein. Accordingly, Georgia Power Company (GPC) has prepared these proposed changes consistent with the guidance contained in GL 89-01. Such action will simplify the RETS, meet the regulatory requirements for radioactive effluents and radiological environmental monitoring, and implement a line-item improvement to the TS, consistent with the Commission's Interim Policy Statement on Technical Specification Improvements.

ANALYSIS

The level of radiological control will not be reduced by the proposed changes to the TS since compliance with applicable regulatory requirements governing radioactive effluents and radiological environmental monitoring, including 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 will continue to be maintained. The proposed changes will allow for the relocation of procedural details from the RETS to the ODCM or PCP, as appropriate.

ENCLOSURE 2 (Continued)

RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS
IN ACCORDANCE WITH GENERIC LETTER 89-01

10 CFR 50.92 EVALUATION

Accordingly, future changes to these procedural details will be controlled by the controls for changes to the ODCM or PCP included in the proposed changes to the Administrative Controls section of the TS. These procedural details are not required to be included in the TS by 10 CFR 50.36.

GPC has reviewed the requirements of 10 CFR 50.92 as they relate to the proposed RETS changes and has made the following determination:

1. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes are administrative in nature and alter only the format and location of programmatic controls and procedural details relative to radioactive effluents, radiological environmental monitoring, solid radioactive wastes, and associated reporting requirements. Compliance with applicable regulatory requirements will continue to be maintained. In addition, the proposed changes do not alter the conditions or assumptions in any of the FSAR accident analyses. Since the FSAR accident analyses remain bounding, the radiological consequences previously evaluated are not adversely affected by the proposed changes. Therefore, it can be concluded that the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.
2. The proposed changes do not create the possibility of a new or different kind of accident from those previously evaluated. The proposed changes do not involve any change to the configuration or method of operation of any plant equipment. Accordingly, no new failure modes have been defined for any plant system or component important to safety nor has any new limiting single failure been identified as a result of the proposed changes. Also, there will be no change in types or increase in the amounts of any radioactive effluents released offsite. Therefore, it can be concluded that the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. The proposed changes do not involve a significant reduction in a margin of safety. The proposed changes do not involve any actual change in the methodology used in the control of radioactive effluents, solid radioactive wastes, or radiological environmental monitoring. These changes are considered administrative in nature, provide for the relocation of procedural details outside the TS, and add appropriate administrative controls to provide continued assurance of compliance with applicable regulatory requirements. These proposed changes also comply with the

ENCLOSURE 2 (Continued)

RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS
IN ACCORDANCE WITH GENERIC LETTER 89-01

10 CFR 50.92 EVALUATION

guidance contained in GL 89-01. Therefore, it can be concluded that the proposed changes do not involve a significant reduction in a margin of safety.

CONCLUSION:

Based on the preceding analysis, GPC has determined that the proposed changes to the TS will not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. Therefore, GPC has determined that the proposed changes meet the requirements of 10 CFR 50.92(c) and do not involve a significant hazards consideration.