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the southern electric system

NED-84-523

October 19, 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
SCHEDULER EXEMPTIONS FOR NON-OUTAGE-RELATED
APPENDIX R MODIFICATIONS

Gentlemen:

In previous correspondence Georgia Power Company (GPC) has discussed a proposed scheduler exemption for implementation of Appendix R non-outage related modifications. In that correspondence we proposed to meet, on a fire area-by-fire area basis, items of mitigation for the period of time from expiration of the 10 CFR 50.48 schedule allowance until the specific modifications in fire areas are complete. GPC herein restates our scheduler exemption request in order to provide a more clear definition of our need.

GPC requests an exemption to the provisions of 10 CFR 50.48(c) to allow an extension to November 30, 1986, of the implementation schedule for the Appendix R-related modifications identified in the "Edwin I. Hatch Nuclear Plant Response to 10 CFR 50.48 and Appendix R" listed below which can be implemented during a non-outage period but which, as part of the total integrated Appendix R modification schedule, can not be completed in the time frame allowed by regulation. These modifications are grouped by fire areas as identified in our July 1, 1982 submittal and subsequent amendments. For clarity, other modifications identified in that submittal which have been determined to require a plant outage to complete are not listed:

- 4.1.1 4160-V Transformer Room - Unit 1
 - o Wrap conduit ESS-II-477 with l-h barrier

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- 4.1.2 West 600-V Switchgear Room - Unit 1
 - o Wrap conduit ESS-II-477 with 1-h barrier
 - o Upgrade west wall to 3-h barrier

- 4.1.4 Control Building Working Floor el 112 ft - Unit 1
 - o Wrap raceway R25-S037-ES4-M14 with 3-h barrier

- 4.1.5 Reactor Building North of Column Line R7 - Unit 1
 - o Install detection on 158 ft elevation and additional detectors associated with the water curtain on the 130 ft elevation
 - o Wrap safe shutdown-related cables in 20 ft sprinkler zone along R7 on elevations 130 ft and 158 ft

- 4.1.6 Reactor Building South of Column Line R7 - Unit 1
 - o Wrap conduit ESS-II-3645 with 1-h barrier
 - o Wrap conduit ESS-II-3648 with 1-h barrier
 - o Wrap conduit ESS-I-3838 with 1-h barrier

- 4.1.7 West DC Switchgear Room - Unit 1
 - o Upgrade wall between switchgear room and oil conditioner room to 3-h barrier

- 4.2.2 Control Building Health Physics Area - Unit 2
 - o Extension of sprinkler systems to cover trays 2CQAB01, 2CRA801, and 2CUA701

- 4.2.4 Control Building Oil Conditioner Room - Unit 2
 - o Wrap raceway 2E22063 with 1-h barrier
 - o Wrap raceway 2E22064 with 1-h barrier
 - o Upgrade wall to 3-h fire rating

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4.2.6 Reactor Building North of Column Line R19 - Unit 2

- o Install sprinkler system on elevation 158 ft
- o Install detection system on elevation 158 ft

4.2.9 Turbine Building East Cableway - Unit 2

- o Wrap the following conduits with 1-h barrier 2CKA701, 2CLA701, 2CMA701, 2E12076, 2E12082, 2E12084, 2E12085, 2E22824, 2MR2543, 2MR2544, and 2CDA801

4.2.10 Diesel Building Switchgear Room 2G - Unit 2

- o Wrap raceway 2ESB170 with 1-h barrier
- o Wrap raceway 2ESB168 with 1-h barrier
- o Wrap raceway 2ESB167 with 1-h barrier

4.3.2 Control Building Corridor - Common

- o Wrap the following raceways with 1-h barrier:

	<u>Unit 1</u>		<u>Unit 2</u>
TM08-01	TEJ8-02	TEA8-03	2CFA801
TEA8-04	TEJ8-01	TEH8-03	2CZA801
TML8-01	TEB8-02	TEH8-01	2CZB801
TEB8-03	TEB8-04	TEH8-02	
ESS II-477		TEB8-01	

- o Extend sprinkler system to provide full coverage

4.3.3 RPS and Vertical Cable Chase Rooms - Common

- o Wrap raceway ESS-I-499 with 1-h barrier
- o Install 3-h fire-rated doors to separate RPS rooms from cable chase

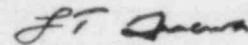
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In our letter NED-84-444 (dated September 4, 1984) implementation dates of October 15, 1984 for Unit 2 and the end of the current refueling outage for Unit 1 were specified for the proposed interim compensatory measures. However, 10 CFR 50.48 allows nine months for implementation of non-outage related modifications. Therefore, GPC hereby revises the planned implementation date for the interim compensatory measures cited in that letter and in NED-84-518 (dated October 2, 1984) to nine months following the issuance of the NRC approval of our requested technical exemptions, that is January 14, 1985.

With this submittal, GPC requests that our proposed scheduler exemption be granted by NRC. The staffs of GPC and its consultants are available for additional discussion of this exemption, should the NRC so desire.

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

Yours very truly,



L. T. Gucwa

WEB:eb

Enclosure

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