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J. T. Beckham, Jr.
Vice President - Nuclear
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May 10, 1996



Docket Nos. 50-321
50-366

HL-5160

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

Edwin I. Hatch Nuclear Plant
Response to NRC Bulletin 96-02

Gentlemen:

On April 11, 1996, the Nuclear Regulatory Commission (NRC) issued Bulletin (NRCB) 96-02, "Movement of Heavy Loads Over Spent Fuel, Over Fuel in the Reactor Core, or Over Safety-Related Equipment." The NRCB emphasizes the importance the NRC places on licensee compliance with existing regulatory guidance associated with the control and handling of heavy loads.

The NRCB also requests that licensees review their plans and capabilities for handling heavy loads in accordance with their licensing basis and existing regulatory guidance. This letter provides the NRC requested 30-day response for the Edwin I. Hatch Nuclear Plant (HNP).

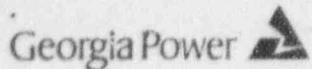
Georgia Power Company (GPC) recognizes the importance of compliance with regulatory guidance associated with the control and handling of heavy loads at HNP during all modes of operation. GPC has performed a review of the plant specific NUREG-0612, Phase I analysis for HNP and determined that the existing administrative controls continue to satisfy the requirements associated with the handling of heavy loads. The movement of heavy loads over safety-related equipment, as previously evaluated, occurs on an as-necessary basis. GPC has no immediate plans to move very heavy loads (such as spent fuel dry storage casks). All licensee actions requested by the NRCB, as appropriate, have been completed. The enclosure to this letter provides a description of these actions.

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

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U. S. Nuclear Regulatory Commission
May 10, 1996

Page 2

Mr. J. T. Beckham, Jr. states he is Vice President of Georgia Power Company and is 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.

Sincerely,

A handwritten signature in black ink, appearing to read "J. T. Beckham, Jr."

J. T. Beckham, Jr.

Sworn to and subscribed before me this 10th day of May, 1996.

Seris Dene Brown
Notary Public
The American Notary Public
Registration No. 9407

SMS/eb

Enclosure: Response to NRC Bulletin 96-02

cc: Georgia Power Company
Mr. H. L. Sumner, Nuclear Plant General Manager
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. Ebneter, Regional Administrator
Mr. B. L. Holbrook, Senior Resident Inspector - Hatch

Enclosure

Edwin I. Hatch Nuclear Plant
Response to NRC Bulletin 96-02

Background

On April 11, 1996, the Nuclear Regulatory Commission (NRC) issued Bulletin (NRCB) 96-02, "Movement of Heavy Loads Over Spent Fuel, Over Fuel in the Reactor Core, or Over Safety-Related Equipment." The NRCB emphasizes the importance the NRC places on licensee compliance with existing regulatory guidance associated with the control and handling of heavy loads and was issued in response to concerns raised by NRC staff with respect to 10 CFR 50.59 justification of spent fuel storage cask handling.

GPC responded to the unnumbered generic letter dated December 22, 1980 referenced in NRCB 96-02 by letters dated July 29, 1983 and January 23, 1984. This correspondence described the complete, systematic evaluation of all overhead load handling equipment for HNP performed by GPC in accordance with the guidance given in NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants." On April 19, 1984, the NRC issued a Safety Evaluation Report (SER) which stated that GPC had satisfied the requirements of Phase I of the referenced NUREG. On June 25, 1985, the NRC issued Generic Letter 85-11 which announced completion of Phase II of the NUREG for all plants.

A review of the HNP heavy loads movement program in response to NRCB 96-02 indicates that current procedures continue to accurately reflect regulatory guidance consistent with NUREG-0612. Non-routine evolutions involving the movement of heavy loads in the plant are also currently evaluated with respect to safe load path and load drop consequence in a manner consistent with the guidance given in NUREG-0612.

A detailed description of GPC's response to the required items (1) through (4) of NRCB 96-02 is provided below:

1. NRC Required Response

Licensees planning to implement activities involving the handling of heavy loads over spent fuel, fuel in the reactor core, or safety-related equipment within the next two years must provide, within 30 days of the date of this bulletin, a report that addresses the licensee's review of its plans and capabilities to handle heavy loads while the reactor is at power in accordance with existing regulatory guidelines. The report should also indicate whether the activities are within the licensing basis and should include, if necessary, a schedule for submission of a license amendment request. Additionally, the report should indicate whether changes to Technical Specifications will be required.

Enclosure

Edwin I. Hatch Nuclear Plant
Response to NRC Bulletin 96-02

Item (1) Continued:

GPC Response

As indicated above, a review of the HNP heavy loads movement program indicates that this program still satisfies the regulatory guidance set forth in NUREG-0612. Plant procedures administratively control the movement of heavy loads with the reactor at power. These activities remain within the scope of the licensing basis for HNP; therefore, no license amendment request is required as a result of this review.

2. NRC Required Response

Licensees planning to implement activities involving the handling of heavy loads over spent fuel, fuel in the reactor core, or safety-related equipment while the reactor is at power and that involve a potential load drop accident not previously evaluated in the FSAR must submit, 6-9 months in advance of the planned movement, a license amendment request so as to afford the staff sufficient time to perform an appropriate review.

GPC Response

The handling of heavy loads over the spent fuel, reactor core, or safety-related equipment at HNP while the reactor is at power is administratively controlled by plant procedure and conforms to the existing regulatory guidance provided in NUREG-0612. GPC currently has no immediate plans to implement activities which involve a potential load drop accident not previously evaluated. A possible exception is the future movement of dry storage casks for spent fuel transfer to an interim onsite storage facility. Reference the response to item (3) below.

3. NRC Required Response

Licensees planning to move dry storage casks over spent fuel, fuel in the reactor core, or safety-related equipment while the reactor is at power must include in item 2 a statement of the capability of performing actions necessary for safe shutdown in the presence of radiological source term that may result from a breach of the dry storage cask, damage to the fuel, and damage to safety-related equipment as a result of a load drop.

Enclosure

Edwin I. Hatch Nuclear Plant
Response to NRC Bulletin 96-02

Item (3) Continued:

GPC Response

Although the implementation of onsite interim storage of spent fuel at HNP is not planned to occur earlier than the fall of 1998, GPC may take prior action to ensure that dry storage casks may be transferred to and from the refueling floor without incident. Such action may require the actual handling of empty dry storage casks on the refueling floor in the vicinity of the spent fuel pool and reactor core while the reactor is at power. As the pertinent load handling equipment, the HNP Unit 1 Reactor Building Overhead Crane, has the handling capacity (125 tons) to transfer a dry storage cask and has been analyzed as single-failure proof in accordance with NUREG-0554 and Section 5.1.6 of NUREG-0612, GPC considers the likelihood of a load drop accident involving a dry storage cask to be extremely small. Therefore, the use of the single-failure proof crane precludes the need for a load drop analysis associated with the movement of a dry storage cask. Based on the guidance provided in NUREG-0612, GPC currently has no plan to perform such an evaluation.

4. NRC Required Response

Licensees planning to perform activities involving the handling of heavy loads over spent fuel, fuel in the reactor core, or safety-related equipment while the reactor is at power must determine whether changes to Technical Specifications will be required in order to allow the handling of heavy loads over fuel assemblies in the spent fuel pool and submit, 6-9 months in advance of the planned movement, the appropriate information for NRC review and approval.

GPC Response

GPC has recently removed the requirements for heavy load movement over the spent fuel from the HNP Technical Specifications as a result of implementation of the Improved Technical Specification program. GPC determined that the associated requirements did not meet the criteria for inclusion in the Improved Technical Specifications. Therefore, no change to the Technical Specifications will be required in order to allow the handling of a heavy load, such as a dry storage cask, over fuel assemblies in the spent fuel pool. If an activity of this nature is determined to constitute an unreviewed safety question, GPC will provide a submittal containing the appropriate information, 6-9 months in advance of the planned evolution, for NRC review and approval.