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Georgia Power
the southern electric system

HL-2409

October 14, 1992

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

PLANT HATCH - UNITS 1 AND 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
IMPLEMENTATION OF THE NEW 10 CFR 20 REQUIREMENTS

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 changes to the Plant Hatch Units 1 and 2 Technical Specifications (TS), Appendix A to Operating Licenses DPR-57 and NPF-5.

As part of Georgia Power Company's strategy to facilitate implementation of the new 10 CFR 20 requirements at Plant Hatch Units 1 and 2, a response to Nuclear Regulatory Commission (NRC) Generic Letter 89-01 was submitted on September 21, 1992. Generic Letter 89-01 allows the procedural details contained in the Radiological Effluent Technical Specifications (RETS) to be relocated to the Offsite Dose Calculation Manual (ODCM) and the Process Control Program (PCP) with appropriate programmatic controls being incorporated into the Administrative Controls section of the TS. Accordingly, the programmatic controls will be used to revise the RETS requirements located in the ODCM and PCP to reflect the new 10 CFR 20 requirements. However, the RETS requirements that will be relocated to the ODCM and PCP in accordance with Generic Letter 89-01 do not represent all the TS requirements that are impacted by the new 10 CFR 20 requirements.

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Enclosure 1 provides a detailed description of the proposed changes and the reasons for the change request.

Enclosure 2 details the bases for our determination that the proposed changes do not involve a significant hazards consideration.

Enclosure 3 provides page change instructions for incorporating the proposed changes. The proposed changed TS pages for Units 1 and 2 follow Enclosure 3. The markup of the proposed changes is also included.

The proposed changes provided in Enclosure 3 represent the remaining scope of TS requirements impacted by the new 10 CFR 20 requirements. Several of the proposed TS changed pages submitted by GPC letter dated September 21, 1992 in response to Generic Letter 89-01 are also affected by the revisions to 10 CFR 20. Therefore, for completeness, the affected proposed TS changed pages provided in Enclosure 3 also incorporate the Generic Letter 89-01 changes. In addition, all of the proposed TS changes associated with the new 10 CFR 20 requirements have been "clouded" to distinguish them from the Generic Letter 89-01 changes. An additional change, not directly related to the new 10 CFR 20 requirements, is also being proposed to correct an error in the Unit 1 TS that is located in a table that is also impacted by the new 10 CFR 20 requirements. This change has been "double clouded" to distinguish it from the Generic Letter 89-01 changes and the new 10 CFR 20 requirement changes. Accordingly, it is requested that a single license amendment combining the effect of this submittal with the September 21, 1992 submittal be issued.

GPC requests that these proposed TS changes be approved by the NRC no later than March 1, 1993, to facilitate implementation of the new 10 CFR 20 requirements at Plant Hatch Units 1 and 2. GPC has committed significant funding and manpower resources to meeting that date. Postponing implementation could have budgetary impacts and impose conflicts with manpower resource allocation. In the event unforeseen circumstances delay implementation of the new 10 CFR 20 requirements, it is requested that the conditions of the license amendment be made effective upon implementation of the new 10 CFR 20 requirements but no later than January 1, 1994.

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.

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 13th day of October, 1992.

Notary Public

MY COMMISSION EXPIRES JUNE 30, 1996

JTB/TMM

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. Ebneter, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

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

ENCLOSURE 1

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ENCLOSURE 1

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PROPOSED CHANGE 1

This proposed change revises the definition of MEMBER(S) OF THE PUBLIC found in Unit 1 Technical Specification (TS) 1.0.ZZ and Unit 2 TS 1.0, and the definition of UNRESTRICTED AREA found in Unit 1 TS 1.0.BBB and Unit 2 TS 1.0.

BASIS FOR PROPOSED CHANGE 1

The definitions of MEMBER(S) OF THE PUBLIC and UNRESTRICTED AREA are being changed to be consistent with their respective definitions contained in the new 10 CFR 20.1003. These changes are simply administrative in nature to facilitate implementation of the new 10 CFR 20 requirements at Plant Hatch. The requirements of the Plant Hatch Units 1 and 2 TS will not be reduced by this change.

PROPOSED CHANGE 2

This proposed change deletes the reference to the Environmental Technical Specifications (ETS) contained in Unit 1 TS Table 3.2-8, Item 1, and Unit 2 TS Table 3.3.6.1-1, footnote (a), regarding radiation monitoring instrumentation and replaces it with a specific reference to proposed Unit 1 and Unit 2 TS 6.18(7) contained in Georgia Power Company's (GPC's) response to Generic Letter 89-01 dated September 21, 1992, for Plant Hatch.

BASIS FOR PROPOSED CHANGE 2

Item 1 of Unit 1 TS Table 3.2-8 regarding the Off-Gas Post Treatment Radiation Monitors states that the trip setting shall be at a value not to exceed the equivalent of the stack release limit indicated in the ETS. Also, Unit 2 TS Table 3.3.6.1-1 contains the same statement in footnote (a) regarding the Off-Gas Post Treatment Monitors (2D11-K615 A, B). In GPC's response to Generic Letter 89-01, programmatic controls regarding gaseous release limits were transferred to proposed TS 6.18(7). To be consistent with that proposed change, the above stated references to the ETS in the Unit 1

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and Unit 2 TS should be revised to reference proposed TS 6.18(7). These changes are simply administrative in nature in order to facilitate implementation of the new 10 CFR 20 requirements at Plant Hatch.

In addition, this proposed change corrects errors that have existed in the Unit 1 and Unit 2 TS since issuance of license amendments 110 and 48, respectively. The license amendments revised the TS to add Radiological Effluent Technical Specifications (RETS) to Appendix A in both units' licenses and to delete the radiological TS from Appendix B to both units' licenses. A change to the above-stated references to the ETS in the Unit 1 and Unit 2 TS was inadvertently omitted during the preparation of the proposed license amendments associated with the original RETS changes.

PROPOSED CHANGE 3

This proposed change revises the trip setting for the Refueling Floor Exhaust Vent Radiation Monitors contained in Unit 1 TS Table 3.2-8, Item 2 by deleting the reference to the ETS and replacing it with a specific trip setting value.

BASIS FOR PROPOSED CHANGE 3

Item 2 of Unit 1 TS Table 3.2-8 regarding the Refueling Floor Exhaust Vent Radiation Monitors states that the trip setting shall be at a value not to exceed the equivalent of the stack release limit indicated in the ETS. However, these instruments are not intended for the control of routine releases but rather serve to perform an emergency safety feature function associated with Standby Gas Treatment System operation and primary and secondary containment isolation. To be consistent with the instruments that perform the same function as those listed in Unit 2 TS Table 3.3.2-2, Item 2.d, the stated reference to the ETS should be replaced with a specific trip setting value of $\leq$ 20 mr/hr. The ability of these instruments to continue to activate the Standby Gas Treatment System and to perform their primary containment and secondary containment isolation functions in the event a high radiation condition exists in the refueling floor ventilation exhaust is not adversely affected by this change.

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PROPOSED CHANGE 4

This proposed change corrects the footnotes for Unit 1 TS 3.15.1.4 and Unit 2 TS 3.11.1.4 regarding the liquid holdup tanks.

BASIS FOR PROPOSED CHANGE 4

The footnote designation for Unit 1 TS 3.15.1.4 is missing and is being corrected to reference footnote (a) found at the bottom of page 3.15-8 which contains Unit 1 TS 3.15.1.4. The footnote designation for Unit 2 TS 3.11.1.4 is also being corrected since it contains a reference to (d) instead of (a) found at the bottom of page 3/4 11-8 which contains Unit 2 TS 3.11.1.4. These changes correct typographical errors and will not reduce the requirements of the Unit 1 and Unit 2 TS.

PROPOSED CHANGE 5

This proposed change deletes action statement b from Unit 1 TS 3.15.1.4 and Unit 2 TS 3.11.1.4 regarding the liquid holdup tanks. Action statement b states, "The provisions of Specification 6.9.1.13(b) are not applicable."

BASIS FOR PROPOSED CHANGE 5

This proposed change corrects an error that has existed in the Unit 1 and Unit 2 TS since issuance of license amendments 149 and 86, respectively. The license amendments modified the TS to incorporate revised reporting requirements, including those found in 10 CFR 50.73. Accordingly, the reporting requirements found in TS 6.9.1.13(b) were deleted. Previously, TS 6.9.1.13(b) required that a Licensee Event Report be prepared for conditions leading to operation in a degraded mode or plant shutdown required by a limiting condition for operation. However, the requirement was deleted in order to conform to the provisions of 10 CFR 50.73. The proposed change is simply administrative in nature and will not reduce the requirements of the Unit 1 and Unit 2 TS.

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PROPOSED CHANGE 6

This proposed change revises Unit 1 TS Bases 3/4.15.1.4 and Unit 2 TS Bases 3/4.11.1.4 to reference the acceptance criteria contained in the new 10 CFR 20 which is used to determine the activity limit for the liquid holdup tanks.

BASIS FOR PROPOSED CHANGE 6

The discussion in Unit 1 Bases 3/4.15.1.4 and Unit 2 Bases 3/4.11.1.4 is modified to state that in the event of an uncontrolled release of the outside temporary holdup tanks, the resulting concentration would be less than the effluent concentration limits (ECL) of the new 10 CFR 20.1302(b)(2)(i) in lieu of the limits specified in the old 10 CFR 20, Appendix B, Table II, Column 2.

An evaluation was performed to determine the activity that could be released from a tank rupture based on ECL values as compared to the current Unit 1 TS (3.15.1.4) and Unit 2 TS (3.11.1.4) limit of 10 curies which is based on MPC values contained in the old 10 CFR 20. The evaluation provided a larger allowable tank activity based on the ECL values. Since a higher activity limit can be determined based on the ECL values, it is conservative to retain the current activity limit of 10 curies. Maintaining the activity limit at 10 curies is also consistent with the guidance contained in NUREG-0133, which states that the curie limit for a temporary tank should be limited to less than or equal to 10 curies, excluding tritium and dissolved or entrained gases, which is consistent with Unit 1 TS 3.15.1.4 and Unit 2 TS 3.11.1.4.

PROPOSED CHANGE 7

This proposed change revises Unit 1 and Unit 2 TS 6.9.1.5.a by updating footnote 2 to incorporate the new 10 CFR 20 reference regarding reports of individual monitoring.

BASIS FOR PROPOSED CHANGE 7

Footnote 2 to Unit 1 and Unit 2 TS 6.9.1.5.a currently contains the old 10 CFR 20 reference to paragraph 20.407 regarding personnel monitoring reports. This reference is being revised to incorporate the new 10 CFR 20 reference to paragraph 20.2206 which

BASIS FOR CHANGE REQUEST

supersedes the old 10 CFR 20 reference to paragraph 20.407. This change does not reduce the reporting requirements contained in Unit 1 and Unit 2 TS 6.9.1.5.a. This change is simply administrative in nature to facilitate implementation of the new 10 CFR 20 requirements at Plant Hatch.

PROPOSED CHANGE 8

This proposed change revises Unit 1 and Unit 2 TS 6.12.1 by incorporating the new 10 CFR 20 reference related to the control of access to high radiation areas.

BASIS FOR PROPOSED CHANGE 8

Unit 1 and Unit 2 TS 6.12.1 currently contains the old 10 CFR 20 reference to paragraph 20.203(c)(2) regarding caution signs, labels, signals and controls associated with entrance or access to high radiation areas. This reference is being revised to incorporate the new 10 CFR 20 reference to paragraph 20.1601(a) which supersedes the old 10 CFR 20 reference. This change will not decrease the effectiveness of the radiation protection programs at Plant Hatch to provide control of exposure from external sources in restricted areas. This change is simply administrative in nature in order to facilitate implementation of the new 10 CFR 20 requirements at Plant Hatch.

PROPOSED CHANGE 9

This proposed change revises proposed Unit 1 and Unit 2 TS 6.17.1.a.2 and 6.18(3) submitted by Georgia Power Company letter dated September 21, 1992, in response to Generic Letter 89-01, to incorporate the new 10 CFR 20 reference regarding dose limits for individual members of the public.

BASIS FOR PROPOSED CHANGE 9

Proposed Unit 1 and Unit 2 TS 6.17.1.a.2 and 6.18(3) submitted by Georgia Power Company letter dated September 21, 1992, contained the Generic Letter 89-01 reference to the old 10 CFR 20.106 regarding radioactivity in effluents to unrestricted areas. This reference is being revised to incorporate the new 10 CFR 20 reference to paragraph

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10 CFR 20.1302 which supersedes the old 10 CFR 20 reference to paragraph 10 CFR 20.106. This change is simply administrative in nature in order to facilitate implementation of the new 10 CFR 20 requirements at Plant Hatch.

PROPOSED CHANGE 10

This proposed change revises proposed Unit 1 and Unit 2 TS 6.18(2) submitted by Georgia Power Company letter dated September 21, 1992, in response to Generic Letter 89-01, in order to accommodate needed operational flexibility to facilitate implementation of the new 10 CFR 20 requirements at Plant Hatch.

BASIS FOR PROPOSED CHANGED 10

Proposed Unit 1 and Unit 2 TS 6.18(2) submitted by Georgia Power Company letter dated September 21, 1992, states that liquid effluent releases to unrestricted areas must conform to the old 10 CFR 20, Appendix B, Table II, Column 2. In accordance with the old 10 CFR 20, the annual dose to a member of the public upon which these concentrations are based is 500 mrem. Although the old 10 CFR 20.106 allows effluent concentrations to be averaged over a year, the TS require that liquid effluent releases be limited to these concentrations at all times (i.e., for instantaneous releases). More restrictive limits were incorporated into the TS by the NRC to assure the dose limits of 10 CFR 50, Appendix I or 40 CFR 190 are not exceeded.

The basic requirements for TS on effluents from nuclear power reactors are stated in 10 CFR 50.36a. These requirements indicate that compliance with effluent TS will keep average annual releases of radioactive material in effluents at small percentages of the limits specified in the old 10 CFR 20.106. These requirements further indicate that operational flexibility is allowed, compatible with considerations of health and safety, which may temporarily result in releases higher than such small percentages, but still within the limits specified in the old 10 CFR 20.106 which references Appendix B, Table II concentrations. These referenced concentrations are specific values which relate to an annual dose of 500 mrem. It is further indicated in 10 CFR 50.36a that when using operational flexibility, best efforts shall be exerted to keep levels of radioactive materials in effluents as low as is reasonably achievable as set forth in 10 CFR 50, Appendix I.

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In accordance with the Introduction to Appendix B of the new 10 CFR 20, the liquid effluent concentration limits stated in Appendix B, Table 2, Column 2, are based on a dose of 50 mrem in a year. Therefore, the previous NRC position that effluent releases must be limited by TS to the concentrations stated in the old 10 CFR 20, Appendix B, Table II, Column 2, at all times, does not appear to be warranted for the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 2, because the requirements of 10 CFR 50.36a are presented in terms of the old 10 CFR 20.106, which relate to an annual dose of 500 mrem, not 50 mrem. Since a release concentration corresponding to a limiting value of 500 mrem in a year (as a dose rate of 500 mrem/year) has been acceptable as a TS limit for liquid effluents, which applies at all times as an assurance that the limits of 10 CFR 50, Appendix I are not likely to be exceeded, it should not be necessary to reduce this limit by a factor of 10.

Subpart D, Section VI, of the Supplementary Information which accompanied the new 10 CFR 20, states that for power reactor licensees, compliance with the limits of 10 CFR 50, Appendix I and 40 CFR 190 will demonstrate compliance with the limits of the new 10 CFR 20.1301, in which dose limits for members of the public are specified. The limits in 10 CFR 50, Appendix I and 40 CFR 190 are specified as annual dose limits, therefore, dose determinations to show compliance with these requirements are in terms of cumulative doses (doses in a quarter or year for Appendix I and a year for 40 CFR 190). If a dose limit of 50 mrem in a year were included in a TS as a limit which applies at all times (i.e., a dose rate of 50 mrem/year), operational flexibility would not be available because the dose rate limit would already be very close to the dose limits specified in 10 CFR 50, Appendix I and 40 CFR 190.

Operational history at Plant Hatch has demonstrated that the use of the concentration values associated with the old 10 CFR 20.106 as TS limits which apply at all times has resulted in calculated doses to a member of the public that are well below the limits of 10 CFR 50, Appendix I. Therefore, the use of concentration values corresponding to annual doses of 500 mrem (10 times the concentration values stated in the new 10 CFR 20, Appendix B, Table 2, Column 2) should not have a negative impact on the ability to continue to operate within the limits of 10 CFR 50, Appendix I and 40 CFR 190.

Having the operational flexibility discussed above is especially important in establishing a basis for effluent monitor setpoint calculations. As discussed above, the concentrations

BASIS FOR CHANGE REQUEST

stated in the new 10 CFR 20, Appendix B, Table 2, Column 2, relate to a dose of 50 mrem in a year. When applied on an instantaneous basis, this corresponds to a dose rate of 50 mrem/year. Such a low value is impractical for use as a basis for effluent monitor setpoint calculations for many liquid effluent release situations when monitor background, sensitivity, and performance must be taken into account.

Therefore, to accommodate operational flexibility needed for effluent releases, proposed Unit 1 and Unit 2 TS 6.18(2) submitted by Georgia Power Company letter dated September 21, 1992, is being revised by restating the limit as 10 times the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 2, to apply at all times. The multiplier of 10 is proposed because the annual dose of 500 mrem, upon which the concentrations in the old 10 CFR 20, Appendix B, Table II, Column 2, are based, is a factor of 10 higher than the annual dose of 50 mrem, upon which the concentrations in the new 10 CFR 20, Appendix E, Table 2, Column 2, are based. Compliance with the limits of the new 10 CFR 20.1301 will be demonstrated by operating within the limits of 10 CFR 50, Appendix I and 40 CFR 190.

PROPOSED CHANGE 11

This proposed change revises proposed TS 6.18(7) submitted by Georgia Power Company letter September 21, 1992, in response to Generic Letter 89-01, in order to accommodate needed operational flexibility to facilitate implementation of the new 10 CFR 20 requirements at Plant Hatch.

BASIS FOR PROPOSED CHANGE 11

Proposed Unit 1 and Unit 2 TS 6.18(7) submitted by Georgia Power Company letter dated September 21, 1992, states that gaseous effluent releases to areas beyond the site boundary must conform to the doses associated with the old 10 CFR 20, Appendix B, Table II, Column 1. In accordance with the old 10 CFR 20, the annual dose to a member of the public upon which these concentrations are based is 500 mrem. Although the old 10 CFR 20.106 allows effluent concentrations to be averaged over a year, the TS require that gaseous effluent releases be limited to a dose rate of 500 mrem/year (total body) which corresponds to these concentrations at all times (i.e., for instantaneous releases).

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BASIS FOR CHANGE REQUEST

More restrictive limits were incorporated into the TS by the NRC to assure that the dose limits of 10 CFR 50, Appendix I or 40 CFR 190 are not exceeded.

The basic requirements for TS on effluents from nuclear power reactors are stated in 10 CFR 50.36a. These requirements indicate that compliance with effluent TS will keep average annual releases of radioactive material in effluents at small percentages of the limits specified in the old 10 CFR 20.106. These requirements further indicate that operational flexibility is allowed, compatible with considerations of health and safety, which may temporarily result in releases higher than such small percentages, but still within the limits specified in the old 10 CFR 20.106 which references Appendix B, Table II concentrations. These referenced concentrations are specific values which relate to an annual dose of 500 mrem. It is further indicated in 10 CFR 50.36a that when using operational flexibility, best efforts shall be exerted to keep levels of radioactive materials in effluents as low as is reasonably achievable as set forth in 10 CFR 50, Appendix I.

In accordance with the Introduction to Appendix B of the new 10 CFR 20, the gaseous effluent concentration limits stated in Appendix B, Table 2, Column 1, are based on a dose of 50 mrem in a year. Therefore, the previous NRC position that effluent releases must be limited by TS to the concentrations stated in the old 10 CFR 20, Appendix B, Table II, Column 1, at all times, does not appear to be warranted for the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 1, because the requirements of 10 CFR 50.36a are presented in terms of the old 10 CFR 20.106, which relate to an annual dose of 500 mrem, not 50 mrem. Since a release concentration corresponding to a limiting value of 500 mrem in a year (as a dose rate of 500 mrem/year) has been acceptable as a TS limit for gaseous effluents, which applies at all times as an assurance that the limits of 10 CFR 50, Appendix I are not likely to be exceeded, it should not be necessary to reduce this limit by a factor of 10.

In Subpart D, Section VI, of the Supplementary Information which accompanied the new 10 CFR 20, it is stated that for power reactor licensees, compliance with the limits of 10 CFR 50, Appendix I and 40 CFR 190 will demonstrate compliance with the limits of the new 10 CFR 20.1301, in which dose limits for members of the public are specified. The limits in 10 CFR 50, Appendix I and 40 CFR 190 are specified as annual dose limits; therefore, dose determinations to show compliance with these requirements are in terms of cumulative doses (doses in a quarter or year for Appendix I and doses in a year for 40 CFR 190). If a dose limit of 50 mrem in a year were included in a TS as a limit which

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applies at all times (i.e., a dose rate of 50 mrem/year), operational flexibility would not be available because the dose rate limit would already be very close to the dose limits specified in 10 CFR 50, Appendix I and 40 CFR 190.

Operational history at Plant Hatch has demonstrated that the use of the concentration values associated with the old 10 CFR 20.106 as TS limits which apply at all times has resulted in calculated doses to a member of the public that are well below the limits of 10 CFR 50, Appendix I. Therefore, the use of concentration values corresponding to annual doses of 500 mrem (10 times the concentration values stated in the new 10 CFR 20, Appendix B, Table 2, Column 1) should not have a negative impact on the ability to continue to operate within the limits of 10 CFR 50, Appendix I and 40 CFR 190.

Having the operational flexibility discussed above is especially important in establishing a basis for effluent monitor setpoint calculations. As discussed above, the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 1, relate to a dose of 50 mrem in a year. When applied on an instantaneous basis, this corresponds to a dose rate of 50 mrem/year. Such a low value is impractical for use as a basis for effluent monitor setpoint calculations for many gaseous effluent release situations when monitor background, sensitivity, and performance must be taken into account.

Therefore, to accommodate operational flexibility needed for effluent releases, proposed Unit 1 and Unit 2 TS 6.18(7) submitted by Georgia Power Company letter dated September 21, 1992, is being revised by restating the limit as 10 times the concentration stated in the new 10 CFR 20, Appendix B, Table 2, Column 1, to apply at all times. The multiplier of 10 is proposed because the annual dose of 500 mrem, upon which the concentrations in the old 10 CFR 20, Appendix B, Table II, Column 1, are based, is a factor of 10 higher than the annual dose of 50 mrem, upon which the concentrations in the new 10 CFR 20, Appendix B, Table 2, Column 1, are based. Compliance with the limits of the new 10 CFR 20.1301 will be demonstrated by operating within the limits of 10 CFR 50, Appendix I and 40 CFR 190.

ENCLOSURE 2

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10 CFR 50.92 EVALUATION

ENCLOSURE 2

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10 CFR 50.92 EVALUATION

The Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license does not involve a significant hazards consideration if operation of the facility in accordance with the proposed amendment would not :

(1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or

(2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or

(3) Involve a significant reduction in a margin of safety.

Georgia Power Company has reviewed the proposed amendment and has determined its adoption would not involve a significant hazards consideration. The basis for this determination is given below.

Background

By letter dated September 21, 1992, Georgia Power Company submitted proposed changes to the Technical Specifications (TS) in response to Generic Letter 89-01 which allows the procedural details contained in the Radiological Effluent Technical Specifications (RETS) to be relocated to the Offsite Dose Calculation Manual (ODCM) and the Process Control Program (PCP) with appropriate programmatic controls being incorporated into the Administrative Controls section of the TS. Following approval by the Nuclear Regulatory Commission, the programmatic controls will be used to revise the procedural details of the RETS, which will be incorporated into the ODCM and PCP to reflect the new 10 CFR 20 requirements. However, the scope of Generic Letter 89-01 does not encompass all of the TS requirements impacted by the new 10 CFR 20. Additional TS changes have been identified, as discussed in Enclosure 1, and are needed in conjunction with the Generic Letter 89-01 response to facilitate Georgia Power Company's goal of implementing the new 10 CFR 20 requirements at Plant Hatch.

ENCLOSURE 2 (Continued)

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10 CFR 50.92 EVALUATION

Analysis

The proposed changes to the TS are required in order to implement the new 10 CFR 20 requirements at Plant Hatch. The proposed TS changes involve (1) Unit 1 and Unit 2 revisions to the Definitions, Bases, and Administrative Controls section, and corrections to footnote and table errors in order to appropriately incorporate the new 10 CFR 20 requirements, (2) a correction to a Unit 1 table error related to instrumentation used to mitigate the radiological consequences of an accident, and (3) revisions to the Unit 1 and Unit 2 Administrative Controls section proposed changes submitted by Georgia Power Company letter dated September 21, 1992, in response to Generic Letter 89-01 to provide operational flexibility needed for liquid and gaseous releases. The level of radiological control will not be reduced by these proposed changes since compliance with applicable regulatory requirements governing radioactive effluents and radiological environmental monitoring, including 10 CFR 50.36a, 10 CFR 50, Appendix I and 40 CFR 190, and requirements governing accident releases including 10 CFR 100, will continue to be maintained.

Basis for Proposed No Significant Hazards Consideration Determination:

Evaluation of Proposed Changes 1, 2, 4, 5, 6, 7, 8, and 9

These changes do not involve a significant hazards consideration for the following reasons:

1. The proposed changes to the TS do not involve a significant increase in the probability or consequences of an accident previously evaluated because they are administrative in nature. The proposed changes update specific definitions and old references to 10 CFR 20, and correct footnote and table errors in order to facilitate implementation of the new 10 CFR 20 requirements. The proposed changes do not alter the conditions or assumptions in any FSAR accident analyses. Since the FSAR accident analyses remain bounding, the radiological consequences previously evaluated are not adversely affected by the proposed changes.

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2. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because they are administrative in nature and 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 amount of effluents released offsite.

3. The proposed changes do not involve a significant reduction in a margin of safety because they are administrative in nature and do not reduce the effectiveness of the radiation protection programs at Plant Hatch. Also, the proposed changes do not involve any actual change in the methodology used in the control of solid radioactive wastes or radiological environmental monitoring. The methodology to be used in the control of radioactive effluents will result in the same effluent release rate as the current methodology now being used.

Basis for Proposed No Significant Hazards Consideration Determination:

Evaluation of Proposed Change 3

This change does not involve a significant hazards consideration for the following reasons:

1. The proposed change to the TS do not involve a significant increase in the probability or consequences of an accident previously evaluated because it is administrative in nature since it corrects a table error by making the instrument trip setting identical to that found in the more current Unit 2 TS. The proposed change does not alter the conditions or assumptions in any FSAR accident analyses. Since the FSAR accident analyses remain bounding, the radiological consequences previously evaluated are not adversely affected by the proposed change.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated because it is administrative in nature and does not involve any change to the configuration or method of operation of the Standby Gas Treatment System, or to the ability to isolate primary and secondary

containment. 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 change.

3. The proposed change does not involve a significant reduction in a margin of safety because it is administrative in nature and does not impact routine releases. Therefore, there will be no reduction in the effectiveness of the radiation protection programs at Plant Hatch. Additionally, the accident analyses are not impacted because primary and secondary containment isolation functions and Standby Gas Treatment System operation are unaffected by this change. Therefore, compliance with the requirements of 10 CFR 100 will be maintained.

Basis for Proposed No Significant Hazards Consideration Determination.

Evaluation of Proposed Changes 10 and 11

These changes do not involve a significant hazards consideration for the following reasons:

1. The proposed changes to the TS do not involve a significant increase in the probability or consequences of an accident previously evaluated because the operational flexibility needed for effluent releases is needed to facilitate implementation of the new 10 CFR 20 requirements. Compliance with applicable regulatory requirements will continue to be maintained. The proposed changes do not alter the conditions or assumptions in any FSAR accident analyses. Since the FSAR accident analyses remain bounding, the radiological consequences previously evaluated are not adversely affected by the proposed changes.

2. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because the operational flexibility needed for effluent releases does 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 amount of effluents released offsite.

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3. The proposed changes do not involve a significant reduction in a margin of safety because the operational flexibility needed for effluent releases does not reduce the effectiveness of the radiation protection programs at Plant Hatch. The proposed changes do not involve any actual change in the methodology used in the control of solid radioactive wastes or radiological environmental monitoring. The methodology to be used in the control of radioactive effluents will result in the same effluent release rate as the current methodology being used. The operational flexibility needed for effluent releases requires the use of concentration values 10 times the values given in the new 10 CFR 20. However, this is acceptable since annual doses will be limited to the doses specified in 10 CFR 50, Appendix I and 40 CFR 190.