



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

December 2, 1992

Docket Nos. 50-321
and 50-366

Mr. W. G. Hairston, III
Senior Vice President -
Nuclear Operations
Georgia Power Company
P. O. Box 1295
Birmingham, Alabama 35201

Dear Mr. Hairston:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ON PROPOSED TECHNICAL
SPECIFICATION CHANGES TO IMPLEMENT THE NEW 10 CFR PART 20 -
EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2
(TAC NOS. M84730 AND M84731)

By letter dated October 14, 1992, you proposed Technical Specification changes to implement the new 10 CFR Part 20 for Edwin I. Hatch Nuclear Plant, Units 1 and 2.

The NRC staff has reviewed your submittal and finds that additional information, identified in the enclosure, is needed before we can complete our review. We request your response to this request within 30 days from the date of this letter.

This request affects fewer than ten respondents and, therefore, it is not subject to Office of Management & Budget review under P.L. 96-511.

Sincerely,

Kahtan N. Jabbour

Kahtan N. Jabbour, Project Manager
Project Directorate II-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Request for Additional
Information

cc w/enclosure:
See next page

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Georgia Power Company

Edwin I. Hatch Nuclear Plant

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REQUEST FOR ADDITIONAL INFORMATION (RAI) ON PLANT HATCH
UNITS 1 AND 2 PROPOSED TECHNICAL SPECIFICATIONS
TO INCORPORATE THE NEW 10 CFR PART 20

TAC NOS. M84730, M84731

- 470.1 The definition of MEMBER OF THE PUBLIC should retain the last sentence of the original TS wording. Additionally, it should read as follows: This category may include persons who use portions of the site for recreational, occupational, or other purposes not associated with the plant.
- 470.2 The definition of UNRESTRICTED AREA should retain the last part of the original TS wording in the last sentence that reads: or any area within the SITE BOUNDARY used for residential quarters or for industrial, commercial, institutional, and/or recreational purposes.
- 470.3 In sections 3/4.15.1.4 (Unit 1) and 3/4.11.1.4 (Unit 2), LIQUID HOLDUP TANKS, of the BASES, it is proposed to delete "10 CFR Part 20, Appendix A, Table II, (column 2)" and replace it with "10 CFR Part 20.1302(b)(2)(i)."

NUREG-0133 and Standard Review Plan 15.7.3 provide guidance in this area. The documents specifically discuss that radioactivity must be controlled so that leaked fluid does not result in concentrations to a water supply in an unrestricted area in excess of the limits of 10 CFR Part 20, Appendix B, Table II, Column 2. This is the instantaneous concentration given in the table. It is not the annual average of the concentration, as would be allowed if the section of the rule were cited (20.1302). The proposed use of 10 CFR 20.1302(b)(2)(i) in the bases section would incorrectly imply that annual averaging of the effluent concentration is allowed. Annual averaging is not allowed for this specification.

Because the new values in Appendix B, Table II, Column 2 to 10 CFR 20.1001-20.2401 are, overall, a factor of 10 lower than before, NRC staff considers it acceptable for licensees to propose a factor of 10 increase for these values. These values will maintain the same overall level of effluent control that existed under the old Part 20. The 10 curie limit remains unchanged.

It is recommended that the BASES section be revised to reference a value of 10 times the limits of Appendix B, Table II, Column 2 to 10 CFR 20.1001-20.2401.

If you do not accept the position given above, provide an explanation and rationalization for your alternative.

- 470.4 In "INSERT 7" (Units 1 and 2), of the Administrative Controls, section 6.18, Radioactive Effluent Controls Program, item 7, the phrase "which corresponds to a dose rate of 500 mrem/year total effective dose equivalent" is unnecessary, inconsistent with Standard Technical Specification wording and provides no additional control in the context of the TS. On this basis, it should therefore be deleted.

The intent of the TS is to limit the concentrations of radioactive material that are released in gaseous effluents to areas beyond the site boundary. The inclusion of wording for purposes other than controlling radioactive gaseous effluents is discouraged. If clarification for other purposes is deemed necessary, it should be placed in the appropriate licensee document, not in the TS.

If you do not accept the position given above, provide an explanation and rationalization for your basis.

- 470.5 In Administrative Controls, section 6.12 (Units 1 and 2), High Radiation Area, your specification needs to be revised to acknowledge that in 10 CFR 20.1601(a), there are three controls listed; a "control device", an "alarm signal", and "entryways that are locked." The proposed TS must be rewritten to include this requirement.

- 470.6 In Administrative Controls, section 6.12 (Units 1 and 2), High Radiation Area, the part of the specification which specifies the distance at which the radiation is to be measured is not included. 10 CFR 20.1601 specifies that a distance of 30 cm (12 in.) be used.

Provide a proposed TS change to include the new distance.

- 470.7 In Administrative Controls, section 6.12.2, of High Radiation Area, the dose rate values need to be revised to specify a range. This is necessary to distinguish the controls needed for a High Radiation Area from those for a Very High Radiation Area. The TS must be revised to specify a range of greater than 1000 mrem in 1 hour but less than 500 rads (5 grays) in 1 hour.

- 470.8 10 CFR 20.1602, Control of access to very high radiation areas, requires additional measures, over those in 10 CFR 20.1601, be taken to prevent unauthorized or inadvertent access to areas in which radiation levels could be encountered at 500 rads (5 grays) or more in 1 hour at 1 meter from a radiation source or any surface through which the radiation penetrates.

Propose a new TS that specifies the measures to be taken to control access to very high radiation areas.

[e.g., a separate plant procedure, approved by the plant operations review committee (PORC), which establishes the control requirements for Very High Radiation Areas]