

Georgia Power Company
4000 American Quarter Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 877-7279

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J. T. Beckham, Jr.
Vice President - Nuclear
Hatch Project

Ronald Eaton
57FR 54860
11/20/92
7
Georgia Power
the southern electric system

December 21, 1992

Docket Nos. 50-321
50-366

HL-3086

Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Docketing and Service Branch

1993 JAN -5 PM 9 29

Comments on Proposed Generic Communication

"Augmented Inservice Inspection Requirements for Mark I and Mark II Steel
Containments, Refueling Cavities, and Associated Drainage Systems"
(57 Federal Register 54860 of November 20, 1992)

Dear Mr. Chilk:

Georgia Power Company (GPC) has reviewed the proposed generic letter, "Augmented Inservice Inspection Requirements for Mark I and Mark II steel containments, refueling cavities, and associated drainage systems," published in the Federal Register on November 20, 1992. In accordance with the request for comments, Georgia Power Company is in total agreement with the NUMARC comments which are to be provided to the NRC. Additionally, the Boiling Water Reactor Owner's Group (BWROG) is providing comments on this document which we believe to be appropriate and beneficial.

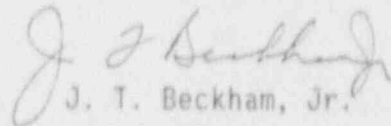
In addition to the aforementioned comments, GPC believes that although some inspection activities may be prudent, the cumulative actions, as specified in the draft Generic Letter, represent unnecessary and unwarranted generic requirements and would result in the expenditure of resources and man-rem exposures without providing a substantial increase in safety. The drywell shell corrosion at Oyster Creek has been attributed to corrosion induced by the presence of moisture in the sand cushion. GPC believes the moisture content is not a generic issue and consequently represents an isolated case.

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Should you have any questions, please advise.

Respectfully submitted,


J. T. Beckham, Jr.

JTB/JDK

cc: Georgia Power Company
Mr. H. L. Sumner, Jr., General Manager - Plant Hatch
NORMS

U. S. Nuclear Regulatory Commission, Washington, DC
Mr. K. N. 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