

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

GEORGIA POWER COMPANY

OGLETHORPE POWER CORPORATION

MUNICIPAL ELECTRIC AUTHORITY OF GEORGIA

CITY OF DALTON, GEORGIA

DOCKET NO. 50-321

EDWIN I. HATCH NUCLEAR PLANT, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.109 License No. DPR-57

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The applications for amendment by Georgia Power Company, et al., (the licensee) dated July 9, 1982, October 24 and December 20, 1983, and April 24, 1984, comply with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
- Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-57 is hereby amended to read as follows:

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Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 109, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

John F. Stolz, Chief Operating Reactors Branch #4 Division of Licensing

Attachment: Changes to the Technical Specifications

Date of Issuance: June 27, 1985

ATTACHMENT TO LICENSE AMENDMENT NO.109

FACILITY OPERATING LICENSE NO. DPR-57

DOCKET NO. 50-321

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain a vertical line indicating the area of change.

Remove	Insert
6-1 6-1a	6-1 6-1a
6-2	6-2
6-3 6-6	6-3 6-6
6-7	6-7
6-8	6-8
6-9 6-11	6-9 6-11
6-12	6-12
6-13	6-13
6-21	6-21

Replace the following pages of the Appendix "B" Environmental Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain a vertical line indicating the area of change.

Remove	Insert
5-1	5-1
5-2	5-2
5-3	5-3
5-4	5-4
5-5	5-5
5-6	5-6
5-9	5-9
5-11	5-11

6.1 RESPONSIBILITY

6.1.1 The General Manager-Plant Hatch shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

OFFSITE

6.2.1 The offsite organization for unit management and technical support shall be as shown on Figure 6.2.1-1.

UNIT STAFF

6.2.2 The unit organization shall be as shown on Figure 6.2.2-1 and:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1.
- b. At least one licensed Operator shall be in the control room for each reactor containing fuel.
- c. At least two licensed Operators shall be present in the control room for each reactor in the process of start-up, scheduled reactor shutdown and during recovery from reactor trips.
- d. An individual qualified to implement radiation protection procedures shall be on site when fuel is in either reactor.
- e. All CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. A Fire Team of at least five members shall be maintained onsite at all times. The Fire Team shall not include the minimum shift crew necessary for safe shutdown of Units 1 and 2 or any personnel required for other essential functions during a fire emergency.

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g. Administrative procedures shall be developed and implemented to limit the working hours of Unit staff who perform safety-related functions; e.g., senior reactor operators, reactor operators, auxiliary operators, health physicists, and key maintenance personnel.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used or during extended periods of shutdown for refueling, major maintenance, or major plant modifications, the following guidelines shall be followed on a temporary basis:

- An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
- (2) An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven day period, all excluding shift turnover time.
- (3) A break of at least eight hours should be allowed between work periods, including shift turnover time.
- (4) Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the General Manager-Plant Hatch or his deputy of higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the General Manager-Plant Hatch or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

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FIGURE 6.2.1-1 OFFSITE ORGANIZATION

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6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions except for the Health Physics Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Manager of Training and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for fire protection shall be maintained under the direction of the Senior Regulatory Specialist and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975, except for fire protection training sessions which shall be held at least once per 92 days.

6.5 REVIEW AND AUDIT

6.5.1 PLANT REVIEW BOARD (PRB)

FUNCTION

6.5.1.1 The PRB shall function to advise the General Manager-Plant Hatch on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Review Board shall be composed of the:

Chairman*:	General Manager-Plant Hatch
Member:	Deputy General Manager
Member:	Superintendent of Operations
Member:	Superintendent of Maintenance
Member:	Health Physics Superintendent
Member:	Superintendent of Quality Control
Member:	Superincendent of Plant Engineering and Services
Member:	Superintendent of Regulatory Compliance
Member (non-voting):	Representative of Site Quality Assurance

*General Manager-Plant Hatch to designate chairman from voting PRB membership as necessary.

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PRB Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PRB activities at any one time.

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MEETING FREQUENCY

6.5.1.4 The PRB shall meet at least once per calendar month and as convened by the PRB Chairman or his designated alternate.

QUORUM

6.5.1.5 The minimum quorum of the PRB necessary for the performance of the PRB responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or designated Chairman and four voting members including alternates.

RESPONSIBILITIES

6.5.1.6 The Plant Review Board shall be responsible for:

- a. Review of (1) all procedures required by Specification 6.8 and changes thereto, (2) any other proposed procedures or changes thereto as determined by the General Manager-Plant Hatch to affect nuclear safety.
- Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to Appendix "A" Technical Specifications.
- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Manager of Nuclear Generation or the Vice President and General Manager Nuclear Operations and to the Safety Review Board (SRB).
- f. Review of events requiring 24 hour written notification to the Commission.
- g. Review of unit operations to detect potential nuclear safety hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the General Manager-Plant Hatch or | the SRB.

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RESPONSIBILITIES (Continued)

- i. Review of the Security Plan and implementing procedures and shall submit recommended changes to the SRB,
- j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the SRB.

AUTHORITY

- 6.5.1.7 The PRB shall:
 - a. Recommend in writing to the General Manager-Plant Hatch approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
 - b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
 - c. Provide written notification with 24 hours to the Manager of Nuclear Generation or the Vice President and General Manager Nuclear Operations and the Safety Review Board of disagreement between the PRB and the General Manager-Plant Hatch; however, the General Manager-Plant Hatch shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The Plant Review Board shall maintain written minutes of each PRB meeting that, at a minimum, document the results of all PRB activities performed under the responsibility and authority provisions of these Technical Specifications. Copies shall be provided to the Manager of Nuclear Generation or the Vice President and General Manager Nuclear Operations and the Safety Review Board.

6.5.2 SAFETY REVIEW BOARD (SRB)

FUNCTION

6.5.2.1 The SRB shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry.

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FUNCTION (Continued)

- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological safety,
- g. Mechanical and electrical engineering,
- h. Quality assurance practices.

COMPOSITION

6.5.2.2 The SRB shall be composed of a minimum of seven persons who as a group provide the expertise to review and audit the operation of a nuclear power plant. The Chairman and Vice Chairman and other members shall be appointed by the Executive Vice President - Power Supply or such other person as he shall designate. The composition of the SRB shall meet the requirements of ANSI N18.7-1976.

ALTERNATES

6.5.2.3 All alternate representatives shall be appointed in writing by the absent member to serve on a temporary basis; however, no more than two alternates shall participate in SRB activities at any one time and alternate representatives shall not have voting privileges.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the SRB Chairman or Vice-Chairman to provide expert advice to the SRB.

MEETING FREQUENCY

6.5.2.5 The SRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per six months thereafter.

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AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the SRB. Each inspection or audit shall be performed within the specified time interval with:

- A maximum allowable extension not to exceed 25% of the inspection or audit interval.
- A total maximum combined interval time for any 3 consecutive inspection or addit intervals not to exceed 3.25 times the specified inspection or audit interval.

These audits shall encompass:

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the entire unit staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Emergency Plan and implementing procedures at least once per 12 months shall be performed by individuals who have no direct responsibility for implementation of this plan.
- f. The Security Plan and implementing procedures at least once per 12 months shall be performed by individuals who have no direct responsibility for implementation of this plan.
- g. Any other area of unit operation considered appropriate by the SRB or the Executive Vice President Power Supply.
- h. The Fire Protection Program and implementing procedures at least once per 24 months.
- An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years. During the year in which the inspection or audit occurs, the requirements of 6.5.2.8i can be affected concurrently.

AUTHORITY

6.5.2.9 The SRB shall report to and advise the Executive Vice President -Power Supply on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Records of SRB activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each SRB meeting shall be prepared, approved and fowarded to the Executive Vice President-Power Supply within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Executive Vice President-Power Supply within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Executive Vice President-Power Supply and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken for REPORTABLE OCCURRENCES.

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9
- b. Each REPORTABLE OCCURRENCE requiring 24 hour notification to the Commission shall be reviewed by the PRB and submitted to the SRB and the Manager of Nuclear Generation or the Vice President and General Manager Nuclear Operations.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The unit shall be placed in at least HOT SHUTDOWN within two hours.
- b. The Safety Limit violation shall be reported to the Commission, the Manager Nuclear Generation or the Vice President and General Manager Nuclear Operations and to the SRB within 24 hours.

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SAFETY LIMIT VIOLATION (Continued)

- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PRB. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the SRB and the Manager of Nuclear Generation or the Vice President and General Manager Nuclear Operations within 14 days of the violation.

6.8 PROCEDURES

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program implementation.

6.8.2 Each procedure of 6.8.1, and other procedures which the General Manager - Plant Hatch has determined to affect nuclear safety, and changes thereto, shall be reviewed by the PRB and approved by the appropriate member of plant management, designated by the General Manager - Plant Hatch, prior to implementation. The General Manager - Plant Hatch will approve administrative procedures, security plan implementing procedures, emergency plan implementing procedures and changes thereto. All other procedures of this specification and changes thereto will be approved by the department head designated by the General Manager - Plant Hatch. The procedures of this specification shall be reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed by the PRB and approved in writing by the General Manager Plant Hatch, or his designee as assigned by 6.8.2, within 14 days of implementation.

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to enter such areas shall be provided with or accompanied by one or more of the following.

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
- c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physics supervision in the Radiation Work Permit.

6.12.2 The requirements of 6.12.1, above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Laboratory Foreman on duty.

6.13 INTEGRITY OF SYSTEMS OUTSIDE CONTAINMENT

The licensee shall implement a program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program shall include the following:

- Provisions establishing preventive maintenance and periodic visual inspection requirements, and
- system leakage test requirements, to the extent permitted by system design and radiological conditions, for each system at a frequency not to exceed refueling cycle intervals. The systems subject to this testing are (1) Residual Heat Removal, (2) Core Spray, (3) Reactor Water Cleanup, (4) HPCI, and (5) RCIC.

6.14 IODINE MONITORING

The licensee shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas* under accident conditions. This program shall include the following:

- 1) Training of personnel,
- 2) Procedures for monitoring, and
- 3) Provisions for maintenance of sampling and analysis equipment.

* Areas requiring personnel access for establishing hot shutdown condition.

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5.0 Administrative Controls

This section describes administrative and management controls established to implement the HNP Environmental Technical Specifications (ETS). Measures specified in this section include assignments of responsibility, review and audit functions, procedures, and reporting requirements.

Corporate responsibility for implementation of the ETS and for assuring that the station is operated in such a way as to provide protection for the environment rests with the Executive Vice President - Power Supply.

Responsibilities for compliance with the ETS and for the environmental monitoring program required by the ETS are given below.

Independent audit shall be provided for all matters, as discussed in Section 5.3.2, by the General Manager of Quality Assurance and Radiological Health and Safety.

- 5.1 Responsibility
 - 5.1.1 The General Manager-Plant Hatch is responsible for monitoring plant effluents; for operating the plant within the Limiting Conditions for Operation (LCOs) specified in Section 2; and for the collection and measurements associated with all radiological samples described in Section 3.2, except for clams, American shad, shoreline sediment, and the annual surveys. These exceptions are the responsibility of the Manager of Environmental Affairs. The General Manager-Plant Hatch also is responsible for implementing the special surveillance activities described in Sections 4.2 and 4.3.
 - 5.1.2 The Manager of Environmental Affairs is responsible for the environmental monitoring programs specified in Sections 3 and 4, except as noted in Sections 5.1.1 and 5.1.3 He also is responsible for Section 4.1 and for those aspects of Section 3.2 that are not assigned either (i) to the General Manager-Plant Hatch by Section 5.1.1 or (ii) to the Manager-Nuclear Engineering and Chief Nuclear Engineer by Section 5. The Manager of Environmental Affairs is responsible for coordinating these programs with appropriate groups.
 - 5.1.3 The Manager-Nuclear Engineering and Chief Nuclear Engineer is responsible for the interpretation, evaluation, and routine reporting of the results of the radiological environmental monitoring program described in Section 3.2.
 - 5.1.4 The General Manager of Quality Assurance and Radiological Health and Safety is responsible for conducting periodic audits of plant operations and the environmental monitoring activities to ensure conformance with the ETS.

5.2 Organization

A chart showing company organization relative to environmental matters is presented in Figure 5.2-1. Changes affecting company organization depicted in Figure 5.2-1 will not require NRC approval prior to implementation, but such changes shall be reported to NRC within 30 days in accordance with Section 5.7.2

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5.3 Review and Audit

- 5.3.1 Independent Review
 - 5.3.1.1 The General Manager-Plant Hatch is responsible for routine review of plant operations to ensure that HNP is operated in compliance with the LCOs specified in Section 2.
 - 5.3.1.2 The Manager of Environmental Affairs shall review the following:
 - a. The conduct of the environmental monitoring programs, on a routine basis, to ensure that the specifications in Sections 3 and 4 are being implemented.
 - b. Proposed changes to plant systems or equipment, provided such changes are identified by the Plant Review Board as having a potential adverse environmental impact.
 - c. Procedures for implementing the responsibilities specified in Section 5.1.2, and proposed changes thereto.
 - d. Proposed changes to the ETS.
 - e. Proposed changes to the Environmental Programs Description Document.
 - 5.3.1.3 The Safety Review Board (SRB) shall review the following:
 - a. Proposed changes to the ETS.
 - b. Results of the environmental monitoring programs prior to their submittal in each Annual Environmental Surveillance Report.
 - c. Violations of ETS to determine whether adequate corrective action is being taken to prevent recurrence.
 - d. Procedures or changes hereto, which could affect the monitoring of station operation, that may be considered by the Manager of Environmental Affairs, the Manager-Nuclear Engineering and Chief Nuclear Engineer, or the Plant Review Board to be appropriate for SRB review.
 - 5.3.1.4 The Plant Review Board (PRB) shall review the following:

a. Proposed changes to plant systems or equipment.

- b. Procedures for implementing the responsibilities specified in Section 5.1.1, and proposed changes thereto.
- c. Proposed changes to the ETS.
- d. Unplanned releases of a radioactive material from the site.
- 5.3.1.5 The Manager-Nuclear Engineering and Chief Nuclear Engineer shall review the following:
 - a. Proposed changes to plant systems or equipment, provided that such changes are identified by the PRB as having a potential radiological environmental impact.
 - b. Proposed changes to Section 3.2 of the ETS.

5.3.2 Audit Responsibility

- 5.3.2.1 The General Manager of Quality Assurance and Radiological Health and Safety is responsible for an audit, conducted at least once a year, of the activities of the General Manager-Plant Hatch, the Manager of Environmental Affairs, and the Manager-Nuclear Engineering and Chief Nuclear Engineer related to compliance with the ETS.
- 5.3.2.2 Audits of facility activities shall be performed at least once a year under the cognizance of the SRB to ensure conformance of facility operation to all provisions of the ETS.

5.4 Action to be taken if a Limiting Condition for Operation is Exceeded

- 5.4.1 Remedial action, as permitted by the ETS, shall be taken until the LCO can be achieved.
- 5.4.2 Violations of an LCO will be reported immediately to the General Manager-Plant Hatch.
- 5.4.3 A separate report of each LCO violation shall be prepared by the General Manager-Plant Hatch. Copies of such reports will be submitted to the Vice President and General Manager Nuclear Operations, the Manager Nuclear Generation, the Manager of Environmental Affairs, the Manager-Nuclear Engineering and Chief Nuclear Engineer, and the Chairman of the SRB for review and approval of corrective actions, as specified in Section 5.3.1.3c.
- 5.4.4 The General Manager-Plant Hatch shall report such violations to the NRC in accordance with Section 5.7.2.

5.5 State and Federal Permit Certifications

Section 401 of PL 92-500, the Federal Water Pollution Control Act Amendments of 1972 (FWPCA), requires any applicant for a Federal license or permit to conduct any activity that may result in any discharge into

provisions of Sections 301, 302, 306, and 307 of the FWPCA. Section 401 of PL 92-500 further requires that any certification provided under this section shall set forth any effluent limitations and other limitations and monitoring requirements necessary to assure that any applicant for a Federal license or permit will comply with the applicable limitations. Certifications provided in accordance with Section 401 set forth conditions on the Federal license or permit for which the certification is provided. Accordingly, the licensee shall comply with the requirements set forth in the currently applicable 401 certification and amendments / thereto issued to the licensee by the Georgia Environmental Protection Division. In accordance with the provisions of the Georgia Water Quality Control act, the FWPCA and the rules and regulations promulgated pursuant to each of these acts, the Georgia Environmental Protection Division, under authority delegated by the U. S. EPA, issued NPDES Permit No. GA 0004120 to the licensee. The NPDES permit authorizes the licensee to discharge from HNP Units 1 and 2 to the Altamaha River in accordance with effluent limitations, monitoring requirements, and other conditions stipulated in the permit, effective August 1, 1983, through December 5, 1987

Subsequent revisions to the certifications will be accommodated in accordance with the provisions of Section 5.7.3.

5.6 Procedures

Detailed written procedures, including applicable check lists and instructions, shall be prepared and followed for all activities involved in implementing the ETS. Procedures shall apply to sampling, data recording and storage, instrument calibration, measurement and data recording and storage, instrument calibration, measurement and analysis, and actions to be taken when limits are approached or exceeded. Testing frequency of any alarm shall be included. These frequencies shall be determined from experience with similar instruments in similar environments and from manufacturers' technical manuals.

Plant operating procedures may be referenced in the above procedures in areas pertaining to maintenance and calibration of instrumentation and in other such areas of interface with the above procedures.

All procedures shall be maintained in a manner convenient for review and inspection. Procedures which are the responsibility of the General Manager-Plant Hatch shall be kept at the plant. Procedures which are the responsibility of the Manager of Environmental Affairs and the Manager-Nuclear Engineering and Chief Nuclear Engineer shall be kept at the GPC General Office.

5.6.1 Environmental Programs Description Document

Based on these procedures, the licensee shall prepare and follow an environmental program description document (EPDD) describing the monitoring programs that are required by Sections 3.1 and 4.1. This document shall include descriptions of sampling equipment locations, frequencies and number of replications, sample analyses, data recording and storage, and instrument calibrations where appropriate. These program descriptions shall be approved by the NRC, and subsequent modifications to these programs shall be made by the licensee in accordance with Sections 5.6.4 and 5.6.5.

5.6.2 Quality Assurance of Program Results

Procedures shall be established to assure the quality of ETS program results, including analytical measurements. These procedures shall document the program in policy directives, designate responsible organizations or individuals, describe purchased services (e.g., contractural laboratory or other contract services), and provide for audits of results and procedures by licensee personnel. In addition, these quality assurance procedures shall provide for systems to identify and correct deficiencies in technical monitoring programs or related administrative activities, to investigate anomalous or suspect results, and to review and evaluate program results.

5.6.3 Compliance with Procedures

In addition to the procedures specified in Section 5.6, the station operating procedures shall include provisions to ensure that each Unit and all its systems and components are operated in compliance with the conditions established in the ETS.

5.6.4 Changes in Procedures, EPDD, and Station Design or Operation

Changes in the procedures, EPDD, and station design or operation may be made in accordance with Section 5.3 and suject to the conditions described below:

- a. The licensee may (i) make changes in the stations design and operation; (ii) make changes in the EPDD developed in accordance with Section 5.6.1; and (iii) conduct tests and experiments not described in the EPDD without prior NRC approval, unless the proposed change, test, or experiment involves either a change in the objectives of the ETS, an unreviewed environmental question of substantive impact, or affects the requirements of Section 5.6.5.
- b. A proposed change, test, or experiment shall be deemed to involve an unreviewed environmental question if it concerns (i) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental statement, as modified by staff's testimony at the hearing, supplements thereto, environmental impact appraisals, or in initial or final adjudicatory decisions; or (ii) a significant change in effluents or power level; or (iii) a matter not previously reviewed and evaluated in the documents specified in (i) of this paragraph which may have a significant adverse environmental impact.

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- c. The licensee shall maintain records of changes to EPDD and to facility design or operation made pursuant to this section. The licensee also shall maintain records of tests and experiments carried out pursuant to paragraph (a) of this section. These records shall include a written evaluation which provides the bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question of substantive impact, or does not constitute a change in the objectives of the ETS, or does not affect the requirements of Section 5.6.5. The licensee shall furnish to the NRC, annually or at such shorter intervals as may be specified in the license, a report containing descriptions, analyses, interpretations, and evaluations of such changes, tests, and experiments.
- d. Changes in the EPDD which affect sampling frequency, location, gear, or replication shall be reported to the NRC within 30 days after their implementation, unless otherwise reported in accordance with Section 5.7.3. Changes which affect sampling technique or data recording and storage shall be reported to the NRC at the end of the year. These reports shall provide a description of the changes made, the reasons for making the changes, and an evaluation of the environmental impact of these changes.
- e. Proposed changes or modifications to plant systems or equipment shall be reviewed in accordance with Section 5.3.
- f. Proposed changes to procedures for implementing the responsibilities specified in Section 5.1.1 shall be reviewed and approved by the PRB. Temporary changes to the procedures that do not change the intent of the original procedure may be made with the concurrence of two individuals holding senior reactor operator licenses. Such changes shall be documented and subsequently reviewed by the PRB and approved by the General Manager-Plant Hatch on a timely basis.
- g. Proposed changes to procedures for implementing the responsibilities specified in Section 5.1.2 shall be reviewed by the staff of Environmental Affairs. Such proposed changes shall subsequently be reviewed and approved by the Manager of Environmental Affairs. Proposed changes to procedures for implementing the responsibilities specified in Section 5.1.3 shall be reviewed by the staff of the Manager-Nuclear Engineering and Chief Nuclear Engineer. Such proposed changes shall subsequently be reviewed and approved by the Manager-Nuclear Engineering and Chief Nuclear Engineer. When deemed appropriate by the Manager of Environmental Affairs or the Manager-Nuclear Engineering and Chief Nuclear Engineer, such proposed changes also shall be reviewed by the SRB prior to implemention.

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(iii) an unusual or important event occurs, as specified in Section 4.2. Reports shall be submitted under one of the report schedules described below:

Prompt Report - Those events requiring prompt reports shall be reported within 24 hours by telephone, telegraph, or facsimile transmission, and followed within 10 days by a written report.

b.

a.

Thirty Day Report - Nonroutine events not requiring a prompt report, as described in Section 5.7.2a, shall be reported to NRC either (i) within 30 days of their occurrence; or (ii) within the time limit designated in the appropriate specification; or (iii) within the time limit specified by the reporting requirement of the corresponding certification or permit issued pursuant to Section 401 or 402 of PL 92-500. The report submitted to NRC in accordance with (iii) of this paragraph will consist of a copy of the report made to the Georgia Department of Natural Resources, Environmental Protection Division.

Written reports and, to the extent possible, preliminary telephone, telegraph or facsimilie reports shall (i) describe, analyze, and evaluate the occurrence, including the extent and magnitude of the impact; (ii) describe the cause of the occurrence; and (iii) indicate corrective action (including any significant changes made in procedures) taken to preclude recurrence and to prevent similar occurrences involving similar components or systems.

5.7.3 Changes in Environmental Technical Specifications and Permits 5.7.3.1 Changes in Environmental Technical Specifications

> Request for changes in ETS shall be submitted to the NRC for review and authorization in accordance with 10 CFR 50.90. The request shall include an evaluation of the environmental impact of the proposed change and a supporting justification. Implementation of such requested changes in ETS shall not commence prior to incorporation by the NRC of the new specifications in the license.

> Proposed changes to the ETS shall be reviewed and approved by the Manager of Environmental Affairs, the PRB and the SRB. Proposed changes to Section 3.2 also will be reviewed and approved by the Manager-Nuclear Engineering and Chief Nuclear Engineer. Prior to approval, the possible impact of the proposed changes will be evaluated. To avoid conflicts and to maintain consistency between the safety and environmental aspects of plant operation, proposed changes to Section 2 will be reviewed in the same manner as proposed changes to the Safety Technical Specifications.

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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

GEORGIA POWER COMPANY

OGLETHORPE POWER CORPORATION

MUNICIPAL ELECTRIC AUTHORITY OF GEORGIA

CITY OF DALTON, GEORGIA

DOCKET NO. 50-366

EDWIN I. HATCH NUCLEAR PLANT, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 47 License No. NPF-5

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The applications for amendment by Georgia Power Company, et al., (the licensee) dated July 9, 1982, October 24 and December 20, 1983, and April 24, 1984, comply with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
- Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-5 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 47, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

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John F. Stolz, Chief) Operating Reactors Branch #4 Division of Licensing

Attachment: Changes to the Technical Specifications

Date of Issuance: June 27, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 47

FACILITY OPERATING LICENSE NO. NPF-5

DOCKET NO. 50-366

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain a vertical line indicating the area of change.

Remove	Insert
6-1	6-1
6-1a	6-1a
6-2	6-2
6-3	6-3
6-5	6-5
6-6	6-6
6-7	6-7
6-8	6-8
6-10	6-10
6-11	6-11
6-12	6-12
6-19	6-19

Replace the following pages of the Appendix "B" Environmental Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain a vertical line indicating the area of change.

Insert
5-1
5-2
5-3
5-4
5-5
5-6
5-9
5-11

6.1 RESPONSIBILITY

6.1.1 The General Manager-Plant Hatch shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

OFFSITE

6.2.1 The offsite organization for unit management and technical support shall be as shown on Figure 6.2.1-1.

UNIT STAFF

6.2.2 The unit organization shall be as shown on Figure 6.2.2-1 and:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1.
- b. At least one licensed Operator shall be in the control room for each reactor containing fuel.
- c. At least two licensed Operators shall be present in the control room for each reactor in the process of start-up, scheduled reactor shutdown and during recovery from reactor trips.
- d. An individual qualified to implement radiation protection procedures shall be on site when fuel is in either reactor.
- e. All CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. A Fire Team of at least five members shall be maintained onsite at all times. The Fire Team shall not include the minimum shift crew necessary for safe shutdown of Units 1 and 2 or any personnel required for other essential functions during a fire emergency.

HATCH UNIT 2

g. Administrative procedures shall be developed and implemented to limit the working hours of Unit staff who perform safety-related functions; e.g., senior reactor operators, reactor operators, auxiliary operators, health physicists, and key maintenance personnel.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used or during extended periods of shutdown for refueling, major maintenance, or major plant modifications, the following guidelines shall be followed on a temporary basis:

- An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
- (2) An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven day period, all excluding shift turnover time.
- (3) A break of at least eight hours should be allowed between work periods, including shift turnover time.
- (4) Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the General Manager-Plant Hatch or his deputy of higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the General Manager-Plant Hatch or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

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FIGURE 6.2.1-1 OFFSITE ORGANIZATION

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6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions except for the Health Physics Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Manager of Training and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for fire protection shall be maintained under the direction of the Senior Regulatory Specialist and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975, except for fire protection training sessions which shall be held at leas once per 92 days.

6.5 REVIEW AND AUDIT

6.5.1 PLANT REVIEW BOARD (PRB)

FUNCTION

6.5.1.1 The PRB shall function to advise the General Manager-Plant Hatch on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 'The Plant Review Board shall be composed of the:

General Manager-Plant Hatch
Deputy General Manager
Superintendent of Operations
Superintendent of Maintenance
Health Physics Superintendent
Superintendent of Quality Control
Superintendent of Plant Engineering Services
Superintendent of Regulatory Compliance
Representative of Site Quality Assurance

*General Manager-Plant Hatch to designate chairman from voting PRB membership as necessary.

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PRB Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PRB activities at any one time.

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MEETING FREQUENCY

6.5.1.4 The PRB shall meet at least once per calendar month and as convened by the PRB Chairman or his designated alternate.

QUORUM

6.5.1.5 The minimum quorum of the PRB necessary for the performance of the PRB responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or designated Chairman and four voting members including alternates.

RESPONSIBILITIES

6.5.1.6 The Plant Review Board shall be responsible for:

- a. Review of (1) all procedures required by Specification 6.8 and changes thereto, (2) any other proposed procedures or changes thereto as determined by the General Manager-Plant Hatch to affect nuclear safety.
- Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to Appendix "A" Technical Specifications.
- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Manager of Nuclear Generation or the Vice President and General Manager Nuclear Operations and to the Safety Review Board (SRB).
- f. Review of events requiring 24 hour written notification to the Commission.
- g. Review of unit operations to detect potential nuclear safety hazards.
- h. Performance of special review investigations or analyses and reports thereon as requested by the General Manager-Plant Hatch or the SRB.

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RESPONSIBILITIES (Continued)

- i. Review of the Security Plan and implementing procedures and shall submit recommended changes to the SRB,
- j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the SRB.

AUTHORITY

- 6.5.1.7 The PRB shall:
 - a. Recommend in writing to the General Manager-Plant Hatch approval | or disapproval of items considered under 6.5.1.6(a) through (d) above.
 - b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
 - c. Provide written notification with 24 hours to the Manager of Nuclear Generation or the Vice President and General Manager Nuclear Operations and the Safety Review Board of disagreement between the PRB and the General Manager-Plant Hatch; however, the General Manager-Plant Hatch shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The Plant Review Board shall maintain written minutes of each PRB meeting that, at a minimum, document the results of all PRB activities performed under the responsibility and authority provisions of these Technical Specifications. Copies shall be provided to the Manager of Nuclear Generation or the Vice President and General Manager Nuclear Operations and the Safety Review Board.

6.5.2 SAFETY REVIEW BOARD (SRB)

FUNCTION

6.5.2.1 The SRB shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry.

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FUNCTION (Continued)

- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological safety,
- g. Mechanical and electrical engineering,
- h. Quality assurance practices.

COMPOSITION

6.5.2.2 The SRB shall be composed of a minimum of seven persons who as a group provide the expertise to review and audit the operation of a nuclear power plant. The Chairman and Vice Chairman and other members shall be appointed by the Executive Vice President - Power Supply or such other person as he shall designate. The composition of the SRB shall meet the requirements of ANSI N18.7-1976.

ALTERNATES

6.5.2.3 All alternate representatives shall be appointed in writing by the absent member to serve on a temporary basis; however, no more than two alternates shall participate in SRB activities at any one time and alternate representatives shall not have voting privileges.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the SRB Chairman or Vice-Chairman to provide expert advice to the SRB.

MEETING FREQUENCY

6.5.2.5 The SRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per six months thereafter.

AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the SRB. Each inspection or audit shall be performed within the specified time interval with:

- A maximum allowable extension not to exceed 25% of the inspection or audit interval.
- A total maximum combined interval time for any 3 consecutive inspection or audit intervals not to exceed 3.25 times the specified inspection or audit interval.

These audits shall encompass:

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the entire unit staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Emergency Plan and implementing procedures at least once per 12 months shall be performed by individuals who have no direct responsibility for implementation of this plan.
- f. The Security Plan and implementing procedures at least once per 12 months shall be performed by individuals who have no direct responsibility for implementation of this plan.
- 9. Any other area of unit operation considered appropriate by the SRB or the Executive Vice President Power Supply.
- h. The Fire Protection Program and implementing procedures at least once per 24 months.
- i. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years. During the year in which the inspection or audit occurs, the requirements of 6.5.2.8i can be affected concurrently.

AUTHORITY

6.5.2.9 The SRB shall report to and advise the Executive Vice President -Power Supply on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Records of SRB activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each SRB meeting shall be prepared, approved and fowarded to the Executive Vice President-Power Supply within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Executive Vice President-Power Supply within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Executive Vice President-Power Supply and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken for REPORTABLE OCCURRENCES.

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9
- b. Each REPORTABLE OCCURRENCE requiring 24 hour notification to the Commission shall be reviewed by the PRB and submitted to the SRB and the Manager of Nuclear Generation or the Vice President and General Manager Nuclear Operations.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The unit shall be placed in at least HOT SHUTDOWN within two hours.
- b. The Safety Limit violation shall be reported to the Commission, the Manager Nuclear Generation or the Vice President and General Manager Nuclear Operations and to the SRB within 24 hours.

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SAFETY LIMIT VIOLATION (Continued)

- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PRB. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the SRB and the Manager of Nuclear Generation or the Vice President and General Manager Nuclear Operations within 14 days of the violation.

6.8 PROCEDURES

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program implementation.

6.8.2 Each procedure of 6.8.1, and other procedures which the General Manager - Plant Hatch has determined to affect nuclear safety, and changes thereto, shall be reviewed by the PRB and approved by the appropriate member of plant management, designated by the General Manager - Plant Hatch, prior to implementation. The General Manager - Plant Hatch will approve administrative procedures, security plan implementing procedures, emergency plan implementing procedures and changes thereto. All other procedures of this specification and changes thereto will be approved by the department head designated by the General Manager - Plant Hatch. The procedures of this specification shall be reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed by the PRB and approved in writing by the General Manager Plant Hatch, or his designee as assigned by 6.8.2, within 14 days of implementation.

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to enter such areas shall be provided with or accompanied by one or more of the following.

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
- c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physics supervision in the Radiation Work Permit.

6.12.2 The requirements of 6.12.1, above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Laboratory Foreman on duty.

6.13 INTEGRITY OF SYSTEMS OUTSIDE CONTAINMENT

The licensee shall implement a program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program shall include the following:

- Provisions establishing preventive maintenance and periodic visual inspection requirements, and
- System leakage test requirements, to the extent permitted by system design and radiological conditions, for each system at a frequency not to exceed refueling cycle intervals. The systems subject to this testing are (1) Residual Heat Removal, (2) Core Spray, (3) Reactor Water Cleanup, (4) HPCI, and (5) RCIC.

5.0 Administrative Controls

This section describes administrative and management controls established to implement the HNP Environmental Technical Specifications (ETS). Measures specified in this section include assignments of responsibility, review and audit functions, procedures, and reporting requirements.

Corporate responsibility for implementation of the ETS and for assuring that the station is operated in such a way as to provide protection for the environment rests with the Executive Vice President - Power Supply.

Responsibilities for compliance with the ETS and for the environmental monitoring program required by the ETS are given below.

Independent audit shall be provided for all matters, as discussed in Section 5.3.2, by the General Manager of Quality Assurance and Radiological Health and Safety.

- 5.1 Responsibility
 - 5.1.1 The General Manager-Plant Hatch is responsible for monitoring plant effluents; for operating the plant within the Limiting Conditions for Operation (LCOs) specified in Section 2; and for the collection and measurements associated with all radiological samples described in Section 3.2, except for clams, American shad, shoreline sediment, and the annual surveys. These exceptions are the responsibility of the Manager of Environmental Affairs. The General Manager-Plant Hatch also is responsible for implementing the special surveillance activities described in Sections 4.2 and 4.3.
 - 5.1.2 The Manager of Environmental Affairs is responsible for the environmental monitoring programs specified in Sections 3 and 4, except as noted in Sections 5.1.1 and 5.1.3 He also is responsible for Section 4.1 and for those aspects of Section 3.2 that are not assigned either (i) to the General Manager-Plant Hatch by Section 5.1.1 or (ii) to the Manager-Nuclear Engineering and Chief Nuclear Engineer by Section 5. The Manager of Environmental Affairs is responsible for coordinating these programs with appropriate groups.
 - 5.1.3 The Manager-Nuclear Engineering and Chief Nuclear Engineer is responsible for the interpretation, evaluation, and routine reporting of the results of the radiological environmental monitoring program described in Section 3.2.
 - 5.1.4 The General Manager of Quality Assurance and Radiological Health and Safety is responsible for conducting periodic audits of plant operations and the environmental monitoring activities to ensure conformance with the ETS.

5.2 Organization

A chart showing company organization relative to environmental matters is presented in Figure 5.2-1. Changes affecting company organization depicted in Figure 5.2-1 will not require NRC approval prior to implementation, but such changes shall be reported to NRC within 30 days in accordance with Section 5.7.2

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- 5.3 Review and Audit
 - 5.3.1 Independent Review
 - 5.3.1.1 The General Manager-Plant Hatch is responsible for routine review of plant operations to ensure that HNP is operated in compliance with the LCOs specified in Section 2.
 - 5.3.1.2 The Manager of Environmental Affairs shall review the following:
 - a. The conduct of the environmental monitoring programs, on a routine basis, to ensure that the specifications in Sections 3 and 4 are being implemented.
 - b. Proposed changes to plant systems or equipment, provided such changes are identified by the Plant Review Board as having a potential adverse environmental impact.
 - c. Procedures for implementing the responsibilities specified in Section 5.1.2, and proposed changes thereto.
 - d. Proposed changes to the ETS.
 - e. Proposed changes to the Environmental Programs Description Document.
 - 5.3.1.3 The Safety Review Board (SRB) shall review the following:
 - a. Proposed changes to the ETS.
 - b. Results of the environmental monitoring programs prior to their submittal in each Annual Environmental Surveillance Report.
 - c. Violations of ETS to determine whether adequate corrective action is being taken to prevent recurrence.
 - d. Procedures or changes hereto, which could affect the monitoring of station operation, that may be considered by the Manager of Environmental Affairs, the Manager-Nuclear Engineering and Chief Nuclear Engineer, or the Plant Review Board to be appropriate for SRB review.
 - 5.3.1.4 The Plant Review Board (PRB) shall review the following:

a. Proposed changes to plant systems or equipment.

- b. Procedures for implementing the responsibilities specified in Section 5.1.1, and proposed changes thereto.
- c. Proposed changes to the ETS.
- d. Unplanned releases of a radioactive material from the site.
- 5.3.1.5 The Manager-Nuclear Engineering and Chief Nuclear Engineer shall review the following:
 - a. Proposed changes to plant systems or equipment, provided that such changes are identified by the PRB as having a potential radiological environmental impact.
 - b. Proposed changes to Section 3.2 of the ETS.
- 5.3.2 Audit Responsibility
 - 5.3.2.1 The General Monager of Quality Assurance and Radiological Health and Safety is responsible for an audit, conducted at least once a year, of the activities of the General Manager-Plant Hatch, the Manager of Environmental Affairs, and the Manager-Nuclear Engineering and Chief Nuclear Engineer related to compliance with the ETS.
 - 5.3.2.2 Audits of facility activities shall be performed at least once a year under the cognizance of the SRB to ensure conformance of facility operation to all provisions of the ETS.
- 5.4 Action to be taken if a Limiting Condition for Operation is Exceeded
 - 5.4.1 Remedial action, as permitted by the ETS, shall be taken until the LCO can be achieved.
 - 5.4.2 Violations of an LCO will be reported immediately to the General Manager-Plant Hatch.
 - 5.4.3 A separate report of each LCO violation shall be prepared by the General Manager-Plant Hatch. Copies of such reports will be submitted to the Vice President and General Manager Nuclear Operations, the Manager Nuclear Generation, the Manager of Environmental Affairs, the Manager-Nuclear Erring and Chief Nuclear Engineer, and the Chairman of the for review and approval of corrective actions, as specified in Section 5.3.1.3c.
 - 5.4.4 The General Manager-Plant Hatch shall report such violations to the NRC in accordance with Section 5.7.2.
- 5.5 State and Federal Permit Certifications

Section 401 of PL 92-500, the Federal Water Pollution Control Act Amendments of 1972 (FWPCA), requires any applicant for a Federal license or permit to conduct any activity that may result in any discharge into

provisions of Sections 301, 302, 306, and 307 of the FWPCA. Section 401 of PL 92-500 further requires that any certification provided under this section shall set forth any effluent limitations and other limitations and monitoring requirements necessary to assure that any applicant for a Federal license or permit will comply with the applicable limitations. Certifications provided in accordance with Section 401 set forth conditions on the Federal license or permit for which the certification is provided. Accordingly, the licensee shall comply with the requirements set forth in the currently applicable 401 certification and amendments / thereto issued to the licensee by the Georgia Environmental Protection Division. In accordance with the provisions of the Georgia Water Quality Control act, the FWPCA and the rules and regulations promulgated pursuant to each of these acts, the Georgia Environmental Protection Division, under authority delegated by the U. S. EPA, issued NPDES Permit No. GA 0004120 to the licensee. The NPDES permit authorizes the licensee to discharge from HNP Units 1 and 2 to the Altamaha River in accordance with effluent limitations, monitoring requirements, and other conditions stipulated in the permit, effective August 1, 1983, through December 5, 1987

Subsequent revisions to the certifications will be accommodated in accordance with the provisions of Section 5.7.3.

5.6 Procedures

Detailed written procedures, including applicable check lists and instructions, shall be prepared and followed for all activities involved in implementing the ETS. Procedures shall apply to sampling, data recording and storage, instrument calibration, measurement and data recording and storage, instrument calibration, measurement and analysis, and actions to be taken when limits are approached or exceeded. Testing frequency of any alarm shall be included. These frequencies shall be determined from experience with similar instruments in similar environments and from manufacturers' technical manuals.

Plant operating procedures may be referenced in the above procedures in areas pertaining to maintenance and calibration of instrumentation and in other such areas of interface with the above procedures.

All procedures shall be maintained in a manner convenient for review and inspection. Procedures which are the responsibility of the General Manager-Plant Hatch shall be kept at the plant. Procedures which are the responsibility of the Manager of Environmental Affairs and the Manager-Nuclear Engineering and Chief Nuclear Engineer shall be kept at the GPC General Office.

5.6.1 Environmental Programs Description Document

Based on these procedures, the licensee shall prepare and follow an environmental program description document (EPDD) describing the monitoring programs that are required by Sections 3.1 and 4.1. This document shall include descriptions of sampling equipment locations, frequencies and number of replications, sample analyses, data recording and storage, and instrument calibrations where appropriate. These program descriptions shall be approved by the NRC, and subsequent modifications to these programs shall be made by the licensee in accordance with Sections 5.6.4 and 5.6.5.

5.6.2 Quality Assurance of Program Results

Procedures shall be established to assure the quality of ETS program results, including analytical measurements. These procedures shall document the program in policy directives, designate responsible organizations or individuals, describe purchased services (e.g., contractural laboratory or other contract services), and provide for audits of results and procedures by licensee personnel. In addition these quality assurance procedures shall provide for systems to identify and correct deficiencies in technical monitoring programs or related administrative activities, to investigate anomalous or suspect results, and to review and evaluate program results.

5.6.3 Compliance with Procedures

In addition to the procedures specified in Section 5.6, the station operating procedures shall include provisions to ensure that each Unit and all its systems and components are operated in compliance with the conditions established in the ETS.

5.6.4 Changes in Procedures, EPDD, and Station Design or Operation

Changes in the procedures, EPDD, and station design or operation may be made in accordance with Section 5.3 and suject to the conditions described below:

- a. The licensee may (i) make changes in the stations design and operation; (ii) make changes in the EPDD developed in accordance with Section 5.6.1; and (iii) conduct tests and experiments not described in the EPDD without prior NRC approval, unless the proposed change, test, or experiment involves either a change in the objectives of the ETS, an unreviewed environmental question of substantive impact, or affects the requirements of Section 5.6.5.
- b. A proposed change, test, or experiment shall be deemed to involve an unreviewed environmental question if it concerns (i) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental statement, as modified by staff's testimony at the hearing, supplements thereto, environmental impact appraisals, or in initial or final adjudicatory decisions; or (ii) a significant change in effluents or power level; or (iii) a matter not previously reviewed and evaluated in the documents specified in (i) of this paragraph which may have a significant adverse environmental impact.

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- c. The licensee shall maintain records of changes to EPDD and to facility design or operation made pursuant to this section. The licensee also shall maintain records of tests and experiments carried out pursuant to paragraph (a) of this section. These records shall include a written evaluation which provides the bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question of substantive impact, or does not constitute a change in the objectives of the ETS, or does not affect the requirements of Section 5.6.5. The licensee shall furnish to the NRC, annually or at such shorter intervals as may be specified in the license, a report containing descriptions, analyses, interpretations, and evaluations of such changes, tests, and experiments.
- d. Changes in the EPDD which affect sampling frequency, location, gear, or replication shall be reported to the NRC within 30 days after their implementation, unless otherwise reported in accordance with Section 5.7.3. Changes which affect sampling technique or data recording and storage shall be reported to the NRC at the end of the year. These reports shall provide a description of the changes made, the reasons for making the changes, and an evaluation of the environmental impact of these changes.
- e. Proposed changes or modifications to plant systems or equipment shall be reviewed in accordance with Section 5.3.
- f. Proposed changes to procedures for implementing the responsibilities specified in Section 5.1.1 shall be reviewed and approved by the PRB. Temporary changes to the procedures that do not change the intent of the original procedure may be made with the concurrence of two individuals holding senior reactor operator licenses. Such changes shall be documented and subsequently reviewed by the PRB and approved by the General Manager-Plant Hatch on a timely basis.
- g. Proposed changes to procedures for implementing the responsibilities specified in Section 5.1.2 shall be reviewed by the staff of Environmental Affairs. Such proposed changes shall subsequently be reviewed and approved by the Manager of Environmental Affairs. Proposed changes to procedures for implementing the responsibilities specified in Section 5.1.3 shall be reviewed by the staff of the Manager-Nuclear Engineering and Chief Nuclear Engineer. Such proposed changes shall subsequently be reviewed and approved by the Manager-Nuclear Engineering and Chief Nuclear Engineer. When deemed appropriate by the Manager of Environmental Affairs or the Manager-Nuclear Engineering and Chief Nuclear Engineer, such proposed changes also shall be reviewed by the SRB prior to implemention.

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(iii) an unusual or important event occurs, as specified in Section 4.2. Reports shall be submitted under one of the report schedules described below:

a.

b.

Prompt Report - Those events requiring prompt reports shall be reported within 24 hours by telephone, telegraph, or facsimile transmission, and followed within 10 days by a written report.

Thirty Day Report - Nonroutine events not requiring a prompt report, as described in Section 5.7.2a, shall be reported to NRC either (i) within 30 days of their occurrence; or (ii) within the time limit designated in the appropriate specification; or (iii) within the time limit specified by the reporting requirement of the corresponding certification or permit issued pursuant to Section 401 or 402 of PL 92-500. The report submitted to NRC in accordance with (iii) of this paragraph will consist of a copy of the report made to the Georgia Department of Natural Resources, Environmental Protection Division.

Written reports and, to the extent possible, preliminary telephone, telegraph or facsimilie reports shall (i) describe, analyze, and evaluate the occurrence, including the extent and magnitude of the impact; (ii) describe the cause of the occurrence; and (iii) indicate corrective action (including any significant changes made in procedures) taken to preclude recurrence and to prevent similar occurrences involving similar components or systems.

5.7.3 Changes in Environmental Technical Specifications and Permits 5.7.3.1 Changes in Environmental Technical Specifications

> Request for changes in ETS shall be submitted to the NRC for review and authorization in accordance with 10 CFR 50.90. The request shall include an evaluation of the environmental impact of the proposed change and a supporting justification. Implementation of such requested changes in ETS shall not commence prior to incorporation by the NRC of the new specifications in the license.

> Proposed changes to the ETS shall be reviewed and approved by the Manager of Environmental Affairs, the PRB and the SRB. Proposed changes to Section 3.2 also will be reviewed and approved by the Manager-Nuclear Engineering and Chief Nuclear Engineer. Prior to approval, the possible impact of the proposed changes will be evaluated. To avoid conflicts and to maintain consistency between the safety and environmental aspects of plant operation, proposed changes to Section 2 will be reviewed in the same manner as proposed changes to the Safety Technical Specifications.

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