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December 11, 1996



Docket Nos. 50-321
50-366

HL-5275

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

Edwin I. Hatch Nuclear Plant
Revised Quality Assurance Program Revision Submittal

Gentlemen:

By letter dated September 4, 1996, Georgia Power Company (GPC) submitted to the Nuclear Regulatory Commission (NRC) a proposal for revision to the Plant Hatch Quality Assurance (QA) Program which incorporated the use of a Qualified Reviewer (QR) to perform certain functions previously performed by the Plant Review Board (PRB). Specifically, the requested change would allow the QR to review and disposition screening evaluations for 10 CFR 50.59 applicability for which a subsequent 10 CFR 50.59 evaluation was not required. The subject submittal was in response to a NRC request, dated August 5, 1996, for a revised QA Program submittal based upon NRC review of the initial GPC submittal dated June 12, 1996.

In response to the GPC submittal of September 4, 1996, the NRC, by letter dated November 14, 1996, provided several comments and indicated that NRC approval was contingent upon the submittal of a second revised QA Program change request dispositioning said comments. The GPC response to the NRC comments is provided in Enclosure 1. As requested, a revised QA Program change submittal is included in Enclosure 2.

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

Sincerely,

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J. T. Beckham, Jr.

SMS/eb

Enclosures: (See next page.)

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Enclosures:

1. Response to NRC Comments Concerning the E. I. Hatch Quality Assurance Program Change Submittal
2. Revised Quality Assurance Program Change Submittal with Corresponding Marked-Up FSAR Pages

cc: Georgia Power Company
Mr. H. L. Sumner, Nuclear Plant General Manager
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. K. Jabbour, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebnetter, Regional Administrator
Mr. B. L. Holbrook, Senior Resident Inspector - Hatch

Enclosure 1

Edwin I. Hatch Nuclear Plant
Response to NRC Comments Concerning
Quality Assurance Program Change Submittal

NRC Comment 1:

It should be noted that your description of the QR's conclusion regarding the existence of an unreviewed safety question (USQ) is incorrect. The Qualified Reviewer's signature on the 50.59 evaluation form will only serve as an independent evaluation verifying that determination of the existence of an USQ need not be performed. If any doubt remains in the QR's mind regarding the applicability of the 50.59 regulation to the matter being evaluated, then the matter should be referred to the PRB for a final evaluation.

GPC Response:

GPC concurs with the NRC opinion concerning the nature of the conclusions reached by the originator, reviewer, approver, and Qualified Reviewer (QR) of a 10 CFR 50.59 screening determination with respect to the existence of an unreviewed safety question (USQ). To ensure that the Qualified Reviewer recognizes and understands the potential for 10 CFR 50.59 applicability in situations where all screening questions are answered "NO", GPC will revise the administrative controls associated with the QR process to provide guidance in this area. Specifically, any 10 CFR 50.59 screening for which a clear determination about applicability cannot be reached by the QR will either be returned to the originator for additional work or forwarded to the PRB for further review.

NRC Comment 2:

The licensee will revise Section 13 of the FSAR, applicable plant procedures governing the preparation and review of 10 CFR 50.59 screening reviews and evaluations, and the revised QA Program to address the requirement for cross-disciplinary review as a licensing basis for screening matters, as necessary.

GPC Response:

GPC agrees with the NRC position that the administrative controls associated with the QR process should address the requirement for cross-disciplinary review of 10 CFR 50.59 screening determinations, as necessary. GPC will revise Chapter 13 of the Unit 2 FSAR and the administrative controls associated with the QR process to document this requirement. The revisions to these documents will be made effective following notification of final approval of the QA program change by the NRC. The revised QA

Enclosure 1
Response to NRC Comments Concerning
Quality Assurance Program Change Submittal

Program submittal included as Enclosure 2 references Chapter 13 of the Unit 2 FSAR for a description of the review process which will include the requirement for cross-disciplinary review, as necessary.

Although the QR will replace the PRB review for applicable procedure revisions, the QR review will not constitute a single point of review for proposed changes to plant program and procedures. Currently, Chapter 17 of the Unit 2 FSAR requires a review of new procedures and revisions to procedures by plant personnel. This requirement is part of the GPC administrative control process for plant procedure and program changes and serves as a multi-tiered review and approval process. Each 50.59 screening determination and associated safety evaluation, as applicable, is peer reviewed by another qualified individual and then reviewed/approved by the responsible department manager or his designee.

NRC Comment 3:

QR screening evaluations will be limited to program and procedure changes only. Proposed plant modifications must continue to be evaluated the PRB.

GPC Response:

It is GPC's opinion that 10 CFR 50.59 does not distinguish between the applicability of the 10 CFR 50.59 screening and evaluation process to changes in plant programs, procedures, or design. As a result, GPC considers the review of changes in each area as being equally important with respect to ensuring continued plant safety. However, the primary benefit of the QR process is to greatly reduce the number of program and procedure changes required to be reviewed by the PRB and to consequently allow the PRB to focus its review efforts on significant issues. Therefore, GPC agrees to the limitation in application of the QR process as stated above. GPC will ensure that all proposed modifications to safety-related systems will continue to be reviewed by the PRB regardless of the answers given on the 10 CFR 50.59 screening determination. The QA Program change submittal, as provided in Enclosure 2 to this letter, has been revised to delete the wording of earlier submittals which referenced QR participation in the plant modification review process.

NRC Comment 4:

The qualification requirements of each QR will meet those for independent reviewers given in Section 4.7.2 of ANSI/ANS 3.1-1981.

Enclosure 1
Response to NRC Comments Concerning
Quality Assurance Program Change Submittal

GPC Response:

As stated in earlier correspondence and telephone conversations with NRC staff, GPC is not currently committed to ANSI/ANS 3.1-1981 as endorsed by Regulatory Guide 1.8, Revision 2. GPC is committed to ANSI N18.1-1971, as endorsed by Regulatory Guide 1.8, Revision 1, for the selection and training of nuclear power plant personnel. In contrast to ANSI/ANS 3.1-1981, ANSI N18.1-1971 does not prescribe qualifications for personnel acting in the capacity of independent review. In accordance with Supplement 13.4A of the Hatch FSAR, GPC currently requires members of the Plant Review Board to be supervisory or higher level individuals from the plant functional area which they represent. In addition, alternate PRB members must be qualified to serve in a supervisory capacity in accordance with plant administrative requirements. In order to ensure that review of material by the QR is consistent with the quality of review performed by members of the PRB, each QR will be required to satisfy the same qualification requirements as a PRB alternate.

With the exception of not requiring that an individual hold a Bachelor Degree in Engineering or related sciences, the Hatch criteria for QR qualification meet the intent of ANSI/ANS 3.1-1981 as follows:

- GPC will require that an individual holding the position of Qualified Reviewer also hold a senior level position (supervisor, senior engineer, etc.). Such an individual is required, by administrative controls, to have significant experience prior to obtaining such a position. Generally, a minimum of five years of experience is required. In many cases, a technical degree is also required.
- Each QR will be designated by the Nuclear Plant General Manager to ensure that the reviews are performed only by individuals with the requisite experience and proven decision-making capabilities. This approach will assure that potential safety questions are recognized and dispositioned appropriately.
- Each of the candidates identified for designation as a QR from one of the various functional areas at the site has a minimum of eight years experience in his or her field of specialty. In many cases, these individuals also hold technical degrees in their respective fields. Those few individuals who do not hold technical degrees have an extensive amount of experience in their respective areas of operation. In these cases, this experience certainly exceeds the guidance of ANSI/ANS 3.1-1981.

GPC will revise the administrative controls associated with the QR process to reflect the above criteria. Enclosure 2 to this letter, which contains the QA Program change submittal, has been revised to incorporate a description of these criteria in Section 17 of the FSAR.