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

Edwin I. Hatch Nuclear Plant
Notification of Discrepancy in Safety Evaluation Report for
Improved Technical Specifications Relative to
Relocation of Information

Gentlemen:

This letter is being sent to inform you of a discrepancy in the March 3, 1995, Nuclear Regulatory Commission (NRC) Safety Evaluation Report (SER) for the Plant Hatch Improved Technical Specifications (ITS). The discrepancy involves the relocation of the general description of the Process Control Program (PCP) for solid radioactive waste. In our ITS submittal of February 25, 1994, we stated our intent to relocate the PCP description from the Technical Specifications to the Quality Assurance (QA) Program Requirements section of the Final Safety Analysis Report (FSAR). However, the PCP description was actually relocated to the PCP manual for solid radioactive waste.

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The purpose of the letter is to inform you of the discrepancy and to seek your approval for "removing" the PCP general description from the QA program section of the FSAR. Its removal could be interpreted as a "reduction in the level of commitment" of the QA program per the requirements of 10 CFR 50.54(a)(3). If this is true, then NRC approval is, therefore, required. Since the QA section of the FSAR was never actually revised to include the PCP, no FSAR pages are being provided with this request

The enclosure provides the justification for the relocation. If you have any questions, please contact this office.

Sincerely,

H. L. Sumner, Jr.

OCV/ld

Enclosure: Notification of Discrepancy

cc: *Southern Nuclear Operating Company*
Mr. P. H. Wells, Nuclear Plant General Manager
NORMS

U. S. Nuclear Regulatory Commission, Washington D. C.
Mr. N. B. Le, Licensing Project Manager - Hatch

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

Enclosure

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The procedural details of the solid radioactive waste program at Plant Hatch are contained in the Solid Radioactive Waste Process Control Program (PCP) Manual, which is an owner-controlled document. Under the previous Hatch Unit 1 and Unit 2 Technical Specifications (TS), a general description of the PCP was contained in Section 6.20. When the conversion was made to Improved Technical Specifications (ITS), it was proposed to change the location of this general description from the TS to the QA section of the FSAR. That intention was described in our ITS submittal to the NRC of February 25, 1995, and reiterated in their Safety Evaluation Report of March 3, 1995. However, the general description of the PCP was actually relocated to the PCP manual.

We believe the QA plan is an inappropriate place to locate the general description of the solid radwaste program since it is not generally used to describe plant operational processes. The solid radwaste plan program remains under the jurisdiction of the Hatch QA program and Appendix B to 10 CFR 50.

The description of the Process Control Program for solid radioactive waste, as it presently appears in the PCP manual, reads as follows:

"The Process Control Program (PCP) shall be implemented by procedures which contain the current formulas, sampling, analyses, test, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial-ground requirements, and other requirements governing the disposal of solid radioactive waste.

Changes to the PCP shall meet the following requirements:

1. They shall be documented, and records of reviews performed shall be retained. This documentation shall contain the following:

    a. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s).

    b. A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.

2. They shall become effective after review and acceptance by the Plant Review Board (PRB) and the approval of the Nuclear Plant General Manager."

This description is exactly the same as it would have appeared had it been relocated to the QA program description of the FSAR. Thus, all the requirements pertaining to retention of records and adherence to federal, state, and local regulations remain the same regardless of the location of the PCP general description. Changes to the PCP are done under 10 CFR 50.59 per a plant procedure requirement, which is the same level of evaluation that would be required if the PCP general description were located in the QA section of the FSAR.

As previously mentioned, details of the solid radwaste program are contained in the PCP manual. These details remain unaffected by the location of the general description of the PCP. As a result, the processing and packaging of solid radwaste, as well as the operation and maintenance of solid radwaste systems, is not affected by the relocation of the PCP general program description. Similarly, the relocation does not affect any other system important to safety and designed to prevent or mitigate the consequences of transients or accidents.

In summary, the result of relocating the PCP from the QA section of the FSAR does not result in a reduction in effectiveness of the QA program. Neither does it reduce the margin of safety of any Technical Specification, transient, or accident analysis limit.