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L. T. Gucwa Manager Nuclear Safety and Licensing



SL-4453 02011 X7GJ17-H120

April 18, 1988

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

PLANT HATCH - UNITS 1, 2 NRC DOCKETS 50-321, 50-366 OPERATING LICENSES DPR-57, NPF-5 RESPONSE TO INSPECTION REPORT 87-32

Gentlemen:

In your letter of March 8, 1988 (which transmitted the results of your inspection number 87-32), you requested additional information relative to four Inspector Follow up Items (IFIs). The IFIs were generated during Mr. A. Gooden's inspection of Georgia Power Company's Emergency Preparedness Program conducted from December 7 to December 10, 1987.

A copy of this response is being provided to NRC Region II for their review.

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

Sincerely,

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L. T. Gucwa

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Enclosures:

1. Transcription of IFI 87-32-01 and GPC Response 2. Transcription of IFI 87-32-02 and GPC Response 3. Transcription of IFI 87-32-03 and GPC Response 4. Transcription of IFI 87-32-04 and GPC Response

c: (see next page)

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c: <u>Georgia Power Company</u> Mr. J. T. Beckham, Jr., Vice President - Plant Hatch GO-NORMS

U. S. Nuclear Regulatory Commission, Washington, D. C. Mr. L. P. Crocker, Licensing Project Manager - Hatch

U. S. Nuclear Regulatory Commission, Region II Dr. J. N. Grace, Regional Administrator Mr. P. Holmes-Ray, Senior Resident Inspector - Hatch

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ENCLOSURE 1

PLANT HATCH - UNITS 1, 2 NRC DOCKETS 50-321, 50-366 OPERATING LICENSES DPR-57, NPF-5 TRANSCRIPTION OF INSPECTOR FOLLOW UP ITEM 50-321/87-32-01 AND 50-366/87-32-01 AND GPC RESPONSE

TRANSCRIPTION OF INSPECTOR FOLLOW UP ITEM 87-32-01

"Review the primary dose assessment code (DOSE) to assure that its use of atmospheric transport and diffusion models is appropriate, that corrections are made for radioactive decay and radionuclide mix after reactor shutdown, and that it can adequately track the release during changes in wind direction."

RESPONSE TO INSPECTOR FOLLOW UP ITEM 87-32-01

Actions which have been or will be taken and the results achieved:

The primary dose assessment code (DOSE) was purchased from a vendor in mid-1980s. Since the purchase of the code, Georgia Power Company (GPC) has made modifications to the code. These modifications were made to enhance the code and make it more applicable to the particular circumstances at Plant Hatch. The code and its changes were verified when each of the changes occurred.

The code uses a straight line Gaussian calculation methodology to determine doses. This methodology is used by other utilities in the industry. However, with the recent increases in sophistication in dose assessment methodologies, the straight line Gaussian methodology is less "state-of-the-art" than other calculation methods.

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ENCLOSURE 1 (Continued)

TRANSCRIPTION OF INSPECTOR FOLLOW UP ITEM 50-321/87-32-01 AND 50-366/87-32-01 AND GPC RESPONSE

GPC will voluntarily (as have other utilities), review the DOSE code and evaluate it in light of the current calculation methodologies. Since the code has been customized, the exact scope of the review/upgrade is not clearly defined.

However, DOSE's methodologies will be evaluated to ensure they comply with applicable regulatory requirements and commitments for the calculations of off-site doses. The evaluation will ensure the appropriateness of assumptions used in the model for: 1) radionuclide mix and decay, 2) atmospheric transport, and 3) plume tracking.

GPC will review the results of the evaluation and take appropriate actions. These actions, if required, will involve either: 1) modifying the existing code, or 2) obtaining a replacement code.

Estimated Date of Completion:

It is anticipated the evaluation will be completed by approximately July 8, 1988. If any corrective actions are required (based on the results of the evaluation), GPC will develop a schedule to track and implement the actions. If required, it is anticipated this schedule will be in place by approximately August 8, 1988.

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ENCLOSURE 2

PLANT HATCH - UNITS 1, 2 NRC DOCKETS 50-321, 50-366 OPERATING LICENSES DPR-57, NPF-5 TRANSCRIPTION OF INSPECTOR FOLLOW UP ITEM 50-321/87-32-02 AND 50-366/87-32-02 AND GPC RESPONSE

TRANSCRIPTION OF INSPECTOR FOLLOW UP ITEM 87-32-02

"Review the equipment and procedures used for the collection of meteorological data used in dose assessment to assure it is in accordance with Regulatory Guide 1.23."

RESPONSE TO INSPECTOR FOLLOW UP ITEM 87-32-02

Actions which have been or will be taken and the results achieved:

Plant personnel reviewed the equipment and procedures that are used for the collection of meteorological data that is used in dose assessment. Although meteorological data that is averaged over a 15-minute period is used in dose assessment (as required by Regulatory Guide 1.23), there is inadequate procedural guidance specific to meteorological data averaging.

In light of the results of this review, plant procedure 73EP-EIP-015-OS (Off-site Dose Assessment), will be revised to require the use of 15-minute averaged meteorological data for dose assessment purposes.

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ENCLOSURE 2 (Continued)

TRANSCRIPTION OF INSPECTOR FOLLOW UP ITEM 50-321/87-32-02 AND 50-366/87-32-02 AND GPC RESPONSE

As a further enhancement to the Emergency Plan program, some plant Emergency Plan Training has been modified. Specifically, the Communicator/Recorder lesson plan has been revised to include the requirement to obtain and use 15-minute averaged meteorological data for dose assessment. In addition, placards have been placed on appropriate meteorological cabinets. The placards remind Communicator/Recorders to use time averaged meteorological data.

Estimated Date of Completion:

It is anticipated the revision to plant procedure 73EP-EIP-015-0S will be effective by approximately October 8, 1988.

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ENCLOSURE 3

PLANT HATCH - UNITS 1, 2 NRC DOCKETS 50-321, 50-366 OPERATING LICENSES DPR-57, NPF-5 TRANSCRIPTION OF INSPECTOR FOLLOW UP ITEM 50-321/87-32-03 AND 50-366/87-32-03 AND GPC RESPONSE

TRANSCRIPTION OF INSPECTOR FOLLOW UP ITEM 87-32-03

"Verify that the completion of data acquisition system program upgrade (Software Modification Request No. 45) includes the capability to produce full data file recovery following computer failures."

RESPONSE TO INSPECTOR FOLLOW UP ITEM 87-32-03

Actions which have been or will be taken and the results achieved:

The data acquisition system software upgrade is currently under development. Upon completion of Software Modification Request (SMR) No. 45, the system will be capable of full data file recovery following computer failures. This will be verified as part of the testing of SMR No. 45 and will occur prior to release of the SMR for use. It should be noted that event data occurring <u>while</u> the computer is down will not be recorded and, therefore, will not be recoverable.

Estimated Date of Completion:

It is anticipated SMR No. 45 will be operational (implemented, tested, and released for use) by approximately October 14, 1988.

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ENCLOSURE 4

PLANT HATCH - UNITS 1, 2 NRC DOCKETS 50-321, 50-366 OPERATING LICENSES DPR-57, NPF-5 TRANSCRIPTION OF INSPECTOR FOLLOW UP ITEM 50-321/87-32-04 AND 50-366/87-32-04 AND GPC RESPONSE

TRANSCRIPTION OF INSPECTOR FOLLOW UP ITEM 87-32-04

"Verify that the plans and/or procedures for the backup EOF adequately address staffing, equipment, and other logistical requirements to accept the transfer of the EOF functions in the event the primary EOF must be evacuated."

RESPONSE TO INSPECTOR FOLLOW UP ITEM 87-32-04

Actions which have been or will be taken and the results achieved:

Plant procedure 63EP-EIP-077-0S (Alternate Emergency Operations Facility [EOF] Activation), will be revised. The revision will include the following items: 1) identification of key staff who would report to the alternate EOF, 2) positioning of the staff in the facility, and 3) stating other logistical requirements (such as transportation and equipment), which would be necessary to activate the alternate facility.

Estimated Date of Completion:

It is anticipated the revision to plant procedure 63EP-EIP-077-0S will be effective by approximately August 18, 1988.

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