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J. T. Beckham, Jr.  
Vice President and General Manager  
Nuclear Operations



*the southern electric system*

SL-204  
251C

February 17, 1986

Director of Nuclear Reactor Regulation  
Attention: Mr. D. Muller, Project Director  
BWR Project Directorate No. 2  
Division of Boiling Water Reactor Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

NRC DOCKETS 50-321, 50-366  
OPERATING LICENSES DPR-57, NPF-5  
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2  
ADMINISTRATIVE CHANGES

Gentlemen:

In accordance with the provisions of 10 CFR 50.90 as required by 10 CFR 50.59(c)(1), Georgia Power Company hereby proposes changes to the Technical Specifications, Appendices A and B to Operating Licenses DPR-57 and NPF-5.

The proposed changes are an amendment to, and in addition to, those described in our letters of November 21, 1984, March 4, 1985, March 22, 1985, and December 23, 1985. The proposed changes would: modify the offsite organization, modify the responsibilities of the Plant Review Board, show the addition of a new primary meteorological tower, clarify the retention period for certain Quality Assurance documents, and delete reference to the Environmental Program Description Document.

Attachment 1 provides a detailed description of the proposed changes and circumstances necessitating the change request.

Attachment 2 details the basis for our determination that the proposed changes do not constitute an unreviewed safety question.

Attachment 3 details the basis for our determination that the proposed changes do not involve significant hazards considerations.

Attachment 4 provides page change instructions for incorporating the proposed changes. The proposed changed Technical Specification pages follow Attachment 4.

The required application fee is attached.

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Director of Nuclear Reactor Regulation  
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BWR Project Directorate No. 2  
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Page Two

In order to allow time for procedure revision and orderly incorporation into copies of the Technical Specifications, we request that the proposed amendment, once approved by the NRC, be issued with an effective date to be no later than 60 days from the date of issuance of the amendment.

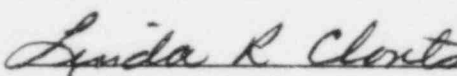
Pursuant to the requirements of 10 CFR 50.91, Mr. J. L. Ledbetter of the Environmental Protection Division of the Georgia Department of Natural Resources will be sent a copy of this letter and all applicable attachments.

J. T. Beckham, Jr. states that he is Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that to the best of his knowledge and belief the facts set forth in this letter are true.

GEORGIA POWER COMPANY

By:   
J. T. Beckham, Jr.

Sworn to and subscribed before me this 17th day of February, 1986.



Notary Public

Notary Public, Clayton County, Georgia  
My Commission Expires Dec. 12, 1989  
MJB/1c

Enclosure

c: Mr. H. C. Nix, Jr.  
Senior Resident Inspector  
Dr. J. N. Grace, (NRC-Region II)  
Mr. J. L. Ledbetter  
GO-NORMS

NRC DOCKETS 50-321, 50-366  
OPERATING LICENSES DPR-57, NPF-5  
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2  
ADMINISTRATIVE CHANGES  
Basis for Change

The proposed changes are an amendment to, and in addition to, those described in our letters of November 21, 1984, March 4, 1985, March 22, 1985, and December 23, 1985. The following proposed changes have been made to Section 6.1 and Figure 6.2.1-1 of Appendix 'A' Technical Specifications and Figure 5.2-1 of Appendix 'B' Environmental Technical Specifications as appropriate as well as the applicable parts of Section 5 of Appendix 'B' as shown in the pages of Attachment 4. The proposed changes reflect a significant increase in staffing of the corporate Nuclear Operations organization. In the overview, the organizational changes have been made to create a more effective management structure.

The organization is being enhanced by the addition of the title and position of Senior Vice President Nuclear Operations. The Senior Vice President Nuclear Power has been reassigned to have total control of the Plant Vogtle construction. The Senior Vice President Nuclear Operations has assumed all of the functions for Plant Hatch formerly assigned to the Senior Vice President Nuclear Power.

The responsibility for the Radiological Environmental Monitoring Program, as currently described in the Technical Specifications, is divided among the General Manager - Plant Hatch, the Manager of Nuclear Engineering and Chief Nuclear Engineer and the Manager of Environmental Affairs. The proposed amendment would change the title of the Manager of Nuclear Chemistry and Health Physics to Manager of Radiological Safety, and would indicate his responsibility for the Radiological Environmental Monitoring Program and management oversight of the Health Physics Program. The proposed amendment would concurrently eliminate the Manager Nuclear Engineering and Chief Nuclear Engineer's responsibility for elements of the Environmental Monitoring Program. The title of Manager Nuclear Engineering and Chief Nuclear Engineer has been changed to Manager Nuclear Safety and Licensing. The position reports to the Senior Vice President Nuclear Operations.

The proposed amendment would recognize the change of title and responsibilities of the General Manager Quality Assurance and Radiological Health and Safety to General Manager Quality Assurance. Concurrent with the change in title for the General Manager Quality Assurance, the Manager of Radiological Safety has assumed responsibilities similar to the Radiological Health and Safety Representative. Therefore, the position of Radiological Health and Safety Representative has been removed from the organizational chart. Clarifying our statements in the December 23, 1985, submittal, the title and position of Deputy General Manager - Quality Assurance remains within the Quality Assurance Department; however, the position is currently vacant. When the position is filled, we will submit an additional amendment to show the Deputy General Manager - Quality Assurance.

The amendment would also remove the position of Vice President and Chief Engineer Power Supply Engineering and Services from the Engineering and Construction Services Department organization due to retirement and reorganization. The title of Hatch Project Manager has been changed to Manager Nuclear Projects and the position moved from the Engineering Department to the Nuclear Operations Department. Concurrent with the move of the Manager Nuclear Projects, the title of Manager Engineering Services is being removed from the organizational charts.

The position of Manager Nuclear Training now reports to the Senior Vice President Nuclear Operations. The position of Manager Nuclear Generation, which has been vacant, is being removed from the organizational charts. The designation of "corporate responsibility for fire protection" is being removed from the Technical Specifications organizational charts. This designation, while required by Appendix R of 10 CFR 50 for the Fire Plan, is not required for Technical Specifications.

In addition to the above changes, there are nine positions which are being added to the offsite organization chart. These are: Manager Nuclear Support, Manager Nuclear Performance, Manager Engineering Liaison, Manager Maintenance and Modification, Nuclear Safety Reviews Manager, Nuclear Safety Manager, Nuclear Licensing Manager - Hatch, Nuclear Licensing Manager - Vogtle, and General Manager Plant Vogtle. The Manager Nuclear Support is responsible for administration of purchasing contracts for the department, human resource planning, records management, control of budgets for the nuclear plants, monitoring of the plants' security and industrial safety programs. The Manager Nuclear Performance is responsible for establishment of the Independent Safety Engineering Groups for the plants, review of audit findings, review of industry publications for items applicable to Georgia Power Company nuclear plants and trend analysis of plant operation. The Manager Engineering Liaison is responsible for control of the design interface between organizations performing engineering work for the plants, provide interpretation of engineering codes and standards and review of vendor information. The Manager Maintenance and Modification is responsible for monitoring plant modification status, development of critical path schedules for outages, monitoring the effectiveness of maintenance programs, and negotiations for outage services. The Nuclear Safety Reviews Manager is responsible for maintaining the Safety Review Board charter, procedures and files, and ensuring communication between the Safety Review Board and the Independent Safety Engineering Groups for the respective plants. The Nuclear Safety Manager is responsible for review of audit findings, review of industry publications for items applicable to Georgia Power Company nuclear plants, independent analysis of unusual occurrences at the plants, and responses to generic nuclear issues. The Nuclear Licensing Manager - Hatch and the Nuclear Licensing Manager - Vogtle have similar duties for their respective plants. These are to communicate Company positions to the NRC, to follow regulatory commitments, to respond to NRC requests for information, and to be the single point of contact between NRR licensing personnel and the Company. The General Manager Plant Vogtle is responsible for the Nuclear Operations of Plant Vogtle.

Additionally, the change would amend the responsibilities of the Plant Review Board to limit review of Technical Specification violations to those which have been determined to be reportable. Another change to the PRB responsibilities would expand review of event for written notifications to the Commission required by Technical Specifications and/or 10 CFR 50.73. It would also change one of the members of the PRB from the Superintendent of Maintenance to the Superintendent of Instrument and Controls.

This change would also change the referenced figure in Section 5 of Unit 2 Appendix 'A' Technical Specifications for the exclusion area, low population zone, and site boundary. The new figure also shows the location of the primary and backup meteorological towers. The newly referenced figure was submitted as part of the Radiological Effluent Technical Specifications in Section 3/4. The amendment would remove the current figure from Section 5 to eliminate any redundancy or confusion. There is no change to the physical boundaries of the site boundary, exclusion area, or low population zone. A recreational area has been added within the site boundary for the use of Plant Hatch employees and their guests.

Additionally, the change would clarify the record retention period for certain Quality Assurance documents. This change is accomplished by inserting additional wording into Specification 6.10.2.i. The proposed change was initiated by discussions with the Hatch Licensing Project Manager at Nuclear Reactor Regulation. This change is intended to reduce potential confusion as to the retention requirements. There is no change to the Quality Assurance Program.

The proposed change would also eliminate reference to the Environmental Program Description Document (EPDD) from Appendix 'B' Technical Specifications. The Environmental Program as described by the EPDD is now complete. Therefore, any reference remaining to it in the Technical Specifications is obsolete and confusing. There has been significant renumbering of Environmental Technical Specifications to accommodate the changes made to the Administrative Section as a result of deletion of the EPDD.

NRC DOCKETS 50-321, 50-366  
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ADMINISTRATIVE CHANGES  
TO CFR 50.59 Evaluation

The Plant Review Board and Safety Review Board have reviewed the proposed changes and have determined that they do not constitute an unreviewed safety question. These changes do not increase the probability or consequences of accidents or malfunctions of equipment previously analyzed since the amendment involves only administrative changes with no decrease in programmatic controls. The only equipment or design modification involved with these changes is the addition of a new primary meteorological tower. The old tower remains in place as an installed, operational backup to the new tower. Consequently, these changes do not create new modes of operation, a potential for new accidents, or a change in the margin of safety as described in the Technical Specifications.

NRC DOCKETS 50-321, 50-366  
OPERATING LICENSES DPR-57, NPF-5  
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2  
ADMINISTRATIVE CHANGES  
TO CFR 50.92 Evaluation

Change 1: The organization is being enhanced by the addition for the title and position of Senior Vice President Nuclear Operations.

The proposed change constitutes: an administrative change in that it changes the personnel and title of the responsible person without changing the responsibilities. Therefore, the results of the change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.

This change does not cause a significant increase in the probability or consequences of accidents or malfunctions of equipment previously analyzed since the amendment involves only administrative changes with no decrease in programmatic controls. Consequently, this change does not create new modes of operation, a potential for new accidents, or a change in the margin of safety as described in the Technical Specifications.

Change 2: The proposed amendment would change the title of the Manager of Nuclear Chemistry and Health Physics to Manager of Radiological Safety. It would indicate his responsibility for the Radiological Environmental Monitoring Program and management oversight of the Health Physics Program. The Manager of Radiological Safety has assumed responsibilities similar to the Radiological Health and Safety Representative. Therefore, the position of Radiological Health and Safety Representative has been removed from the organizational chart.

The proposed change constitutes: an administrative change in that it changes the title and responsibilities of an existing position. Therefore, the results of the change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.

This change does not cause a significant increase in the probability or consequences of accidents or malfunctions of equipment previously analyzed since the amendment involves only administrative changes with no decrease in programmatic controls. Consequently, this change does not create new modes of operation, a potential for new accidents, or a change in the margin of safety as described in the Technical Specifications.

Change 3: The proposed amendment would eliminate any responsibility for the Environmental Monitoring Program for the Manager Nuclear Engineering and Chief Nuclear Engineer. The title of Manager Nuclear Engineering and Chief Nuclear Engineer has been changed to Manager Nuclear Safety and Licensing. The position reports to the Senior Vice President Nuclear Operations.

The proposed change constitutes: an administrative change in that it changes the title and responsibilities of an existing position. Therefore, the results of the change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.

This change does not cause a significant increase in the probability or consequences of accidents or malfunctions of equipment previously analyzed since the amendment involves only administrative changes with no decrease in programmatic controls. Consequently, this change does not create new modes of operation, a potential for new accidents, or a change in the margin of safety as described in the Technical Specifications.

Change 4: The proposed amendment would recognize the change of title and responsibilities of the General Manager Quality Assurance and Radiological Health and Safety to General Manager Quality Assurance.

The proposed change constitutes: an administrative change in that it changes the title, responsibilities, and personnel of an existing position. Therefore, the results of the change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.

This change does not cause a significant increase in the probability or consequences of accidents or malfunctions of equipment previously analyzed since the amendment involves only administrative changes with no decrease in programmatic controls. Consequently, this change does not create new modes of operation, a potential for new accidents, or a change in the margin of safety as described in the Technical Specifications.

Change 5: The amendment would also remove the position of Vice President and Chief Engineer Power Supply Engineering and Services which has been deleted from the Engineering and Construction Services Department due to retirement and reorganization.

The proposed change constitutes: an administrative change in that it removes an existing position. Therefore, the results of the change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.



This change does not cause a significant increase in the probability or consequences of accidents or malfunctions of equipment previously analyzed since the amendment involves only administrative changes with no decrease in programmatic controls. Consequently, this change does not create new modes of operation, a potential for new accidents, or a change in the margin of safety as described in the Technical Specifications.

Change 6: The title of Hatch Project Manager has been changed to Manager Nuclear Projects and the position moved from the Engineering Department to the Nuclear Operations Department. Concurrent with the move of the Manager Project Engineering, the title of Manager Engineering Services is being removed from the organizational charts.

The proposed change constitutes: an administrative change in that it changes the title and relative position of an existing position and removes another position. Therefore, the results of the change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.

This change does not cause a significant increase in the probability or consequences of accidents or malfunctions of equipment previously analyzed since the amendment involves only administrative changes with no decrease in programmatic controls. Consequently, this change does not create new modes of operation, a potential for new accidents, or a change in the margin of safety as described in the Technical Specifications.

Change 7: The position of Manager Nuclear Training reports to the Senior Vice President Nuclear Operations.

The proposed change constitutes: an administrative change in that it changes the relative position of an existing position. Therefore, the results of the change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.

This change does not cause a significant increase in the probability or consequences of accidents or malfunctions of equipment previously analyzed since the amendment involves only administrative changes with no decrease in programmatic controls. Consequently, this change does not create new modes of operation, a potential for new accidents, or a change in the margin of safety as described in the Technical Specifications.

Change 8: The position of Manager Nuclear Generation, which has been vacant, is being removed from the organizational charts.

The proposed change constitutes: an administrative change in that it removes from the charts a vacant position. Therefore, the results of the change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.

This change does not cause a significant increase in the probability or consequences of accidents or malfunctions of equipment previously analyzed since the amendment involves only administrative changes with no decrease in programmatic controls. Consequently, this change does not create new modes of operation, a potential for new accidents, or a change in the margin of safety as described in the Technical Specifications.

Change 9: The designation of "corporate responsibility for fire protection" is being removed from the organizational charts.

The proposed change constitutes: an administrative change in that it removes an administrative designation. Therefore, the results of the change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.

This change does not cause a significant increase in the probability or consequences of accidents or malfunctions of equipment previously analyzed since the amendment involves only administrative changes with no decrease in programmatic controls. Consequently, this change does not create new modes of operation, a potential for new accidents, or a change in the margin of safety as described in the Technical Specifications.

Change 10: There are nine positions which are being added to the offsite organization chart in Appendix 'A' Technical Specifications. These are: Manager Nuclear Support, Manager Nuclear Performance, Manager Engineering Liaison, Manager Maintenance and Modification, Nuclear Safety Reviews Manager, Nuclear Safety Manager, Nuclear Licensing Manager - Hatch, Nuclear Licensing Manager - Vogtle, and General Manager Plant Vogtle.

The proposed change constitutes: an administrative change in that it increases the detail given in the organization chart. Therefore, the results of the change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.

This change does not cause a significant increase in the probability or consequences of accidents or malfunctions of equipment previously analyzed since the amendment involves only administrative changes with no decrease in programmatic controls. Consequently, this change does not create new modes of operation, a potential for new accidents, or a change in the margin of safety as described in the Technical Specifications.

Change 11: Additionally, the change would amend the responsibilities of the Plant Review Board to limit Technical Specification Violations to those which have been determined to be reportable.

The proposed change constitutes: an administrative change in that it clarifies the responsibilities of the Plant Review Board. Therefore, the results of the change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.

This change does not cause a significant increase in the probability or consequences of accidents or malfunctions of equipment previously analyzed since the amendment involves only administrative changes with no decrease in programmatic controls. Consequently, this change does not create new modes of operation, a potential for new accidents, or a change in the margin of safety as described in the Technical Specifications.

Change 12: This change would also change the referenced figure in Section 5 of Unit 2 Appendix 'A' Technical Specifications for the exclusion area, low population zone, and site boundary to the figure submitted as part of the Radiological Effluent Technical Specifications in Section 3/4. There is no change to the physical boundaries of the site boundary, exclusion area, or low population zone. There has been the addition of a recreational area within the site boundary for the use of Plant Hatch employees and their guests.

The proposed change constitutes: an administrative change in that it changes the location of a referenced drawing within Technical Specifications and increases the information on that drawing. Therefore, the results of the change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.

This change does not cause a significant increase in the probability or consequences of accidents or malfunctions of equipment previously analyzed since the amendment involves an increase in the equipment available to assess an accident by the addition of a new primary meteorological tower and retention of the old as an installed backup. Consequently, this change does not create new modes of operation, a potential for new accidents, or a change in the margin of safety as described in the Technical Specifications.

Change 13: Additionally, the change would clarify the record retention period for certain Quality Assurance documents. This change is accomplished by inserting additional wording into Specification 6.10.2.i. There is no change to the Quality Assurance Program.

The proposed change constitutes: an administrative change in that it clarifies the retention requirements for certain records. Therefore, the results of the change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.

This change does not cause a significant increase in the probability or consequences of accidents or malfunctions of equipment previously analyzed since the amendment involves only administrative changes with no decrease in programmatic controls. Consequently, this change does not create new modes of operation, a potential for new accidents, or a change in the margin of safety as described in the Technical Specifications.

Change 14: Another change to the PRB responsibilities would expand review of event for written notifications to the Commission to those required by Technical Specifications and/or 10 CFR 50.73.

The proposed change constitutes: an administrative change in that it increases the responsibilities of the Plant Review Board. Therefore, the results of the change is consistent with Item (ii) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.

This change does not cause a significant increase in the probability or consequences of accidents or malfunctions of equipment previously analyzed since the amendment involves only administrative changes with an increase in programmatic controls. Consequently, this change does not create new modes of operation, a potential for new accidents, or a change in the margin of safety as described in the Technical Specifications.

Change 15: One of the members of the Plant Review Board is being changed.

The proposed change constitutes: an administrative change in that it changes the responsibilities of an existing position. Therefore, the results of the change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.

This change does not cause a significant increase in the probability or consequences of accidents or malfunctions of equipment previously analyzed since the amendment involves only administrative changes with no decrease in programmatic controls. Consequently, this change does not create new modes of operation, a potential for new accidents, or a change in the margin of safety as described in the Technical Specifications.

Change 16: The proposed change would also eliminate reference to the Environmental Program Description Document. The Environmental Program as described by the document is now complete.

The proposed change constitutes: relief granted upon demonstration of acceptable operation in that since the Environmental Program described by the EPDD has been completed, reference to that document should be deleted. Therefore, the results of the change is consistent with Item (iv) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.

This change does not cause a significant increase in the probability or consequences of accidents or malfunctions of equipment previously analyzed since the amendment involves only administrative changes with no decrease in programmatic controls. Consequently, this change does not create new modes of operation, a potential for new accidents, or a change in the margin of safety as described in the Technical Specifications.

Change 17:           The proposed change would alter the approval requirements for temporary procedures under the Environmental Technical Specifications (ETS).

The proposed change constitutes: clarification of the time limit for plant management approval and imposition of the same SRC approval requirement for ETS as currently exists in Appendix 'A' Technical Specifications. Therefore, the results of the change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.

This change does not cause a significant increase in the probability or consequences of accidents or malfunctions of equipment previously analyzed since the amendment involves only administrative changes with no decrease in programmatic controls. Consequently, this change does not create new modes of operation, a potential for new accidents, or a change in the margin of safety as described in the Technical Specifications.

ATTACHMENT 4

NRC DOCKETS 50-321, 50-366  
 OPERATING LICENSES DPR-57, NPF-5  
 EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2  
ADMINISTRATIVE CHANGES

The proposed change to the Technical Specifications (Appendices A and B to the Operating Licenses) would be incorporated as follows:

	<u>Remove Page</u>	<u>Insert Page</u>
Unit 1		
	6-1	6-1
	6-2	6-2
	6-6	6-6
	6-7	6-7
	6-8	6-8
	6-12	6-12
	6-13	6-13
	6-13a	6-13a
Unit 2		
	5-1	5-1
	5-2	5-2
	5-3	5-3
	6-1	6-1
	6-2	6-2
	6-5	6-5
	6-6	6-6
	6-7	6-7
	6-11	6-11
	6-12	6-12
	6-12a	6-12a
ETS		
	i	i
	5-1	5-1
	5-2	5-2
	5-3	5-3
	5-4	5-4
	5-5	5-5
	5-6	5-6
	5-7	5-7
	5-9	5-9
	5-10	5-10