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Georgia Power

The Southern Electric System

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2008C
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May 4, 1988

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

PLANT HATCH - UNITS 1 AND 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
STATUS OF RESPONSE TO GENERIC LETTER 83-28

Gentlemen:

Nuclear Regulatory Commission (NRC) Generic Letter 83-28, Items 3.1.1, 3.1.2, 3.2.1, and 3.2.2, require performance of test and maintenance procedure reviews to ensure post operability testing and vendor and engineering recommendations are properly implemented. These reviews are required for reactor trip system procedures (Items 3.1.1 and 3.1.2) and procedures for all other safety-related components (Items 3.2.1 and 3.2.2). As detailed in our letters of August 21, 1986 and July 1, 1987, Georgia Power Company (GPC) is addressing these items through performance of a comprehensive procedure upgrade program. NRC's letter of July 29, 1987 discussed the status of GPC's compliance with the above-mentioned items of Generic Letter 83-28 and indicated the acceptability of GPC's approach and schedule, which called for completion of reviews for Technical Specifications surveillance procedures (encompassing the required reviews) by the end of 1987.

The purpose of this letter is to inform the NRC that completion of all Technical Specifications surveillance procedures required for closure of Items 3.1.1, 3.1.2, 3.2.1, and 3.2.2 of Generic Letter 83-28 will not occur until August 1988, when the procedures will be released for validation. The schedule was extended primarily for the following reasons:

1. A large number of procedures (483) contain Technical Specifications surveillance requirements.
2. GPC is making a concerted effort to ensure that the Technical Specifications requirements are properly interpreted in order to ensure accurate incorporation of these requirements in the

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U.S. Nuclear Regulatory Commission
May 4, 1988
Page Two

upgraded procedures. If procedure upgrade personnel have any questions related to Technical Specifications requirements, the questions are forwarded to the onsite Nuclear Safety and Compliance (NSAC) organization for resolution. If the specific concern cannot be readily resolved by NSAC, the concern is forwarded to the corporate Nuclear Safety and Licensing (NSL) organization for resolution. In providing adequate guidance to NSAC, NSL may have to obtain information from the NRC, the nuclear steam supply system (NSSS) vendor, or the architect engineers (AEs). This process can be very time consuming; however, GPC believes each step is necessary to achieve a quality product.

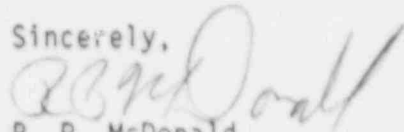
3. The internal multidisciplinary review cycle is structured to ensure each upgraded procedure properly incorporates the Technical Specifications requirements and is technically correct. The review process consists of a review by the affected department, investigation and resolution of the comments by project personnel, and reviews by other concerned departments, NSAC, and the Plant Review Board. During all reviews, comments and questions are resolved and any required changes are made to the procedure.

At present, the 483 Technical Specifications-related surveillance procedures have been drafted as upgraded procedures. The first departmental technical review has been accomplished on all 483 procedures, and 311 procedures have been sent to the department manager for validation.

For additional assurance, prior to release, the procedures are validated through actual performance, where possible. In some cases performance of the procedure will not occur for some time, particularly if outage conditions are required. Validation is complete for approximately 220 of the Technical Specifications surveillance procedures.

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

Sincerely,



R. P. McDonald
Executive Vice President,
Nuclear Operations

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U.S. Nuclear Regulatory Commission
May 4, 1988
Page Three

c: Georgia Power Company
Mr. J. T. Beckham, Jr., Vice President - Plant Hatch
Mr. L. T. Gucwa, Manager Nuclear Safety and Licensing
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