

June 2, 2020

Docket Nos.: 50-321  
50-366

NL-20-0670

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555-0001

Edwin I. Hatch Nuclear Plant - Units 1 and 2  
Response to Request for Additional Information (RAI) Regarding Application to Adopt  
10 CFR 50.69, "Risk-Informed Categorization and  
Treatment of Structures, Systems and Components for Nuclear Power Reactors"

Ladies and Gentlemen:

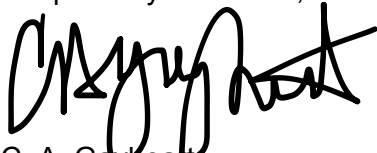
By letter dated June 7, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18158A583), and as supplemented by letters dated July 16, 2019 and December 18, 2019 (ADAMS Accession Nos. ML19197A097 and ML19352F705), Southern Nuclear Operating Company (SNC) submitted a license amendment request (LAR) for Edwin I. Hatch Nuclear Plant (HNP) Units 1 and 2 to adopt Title 10 of Code of Federal Regulations (CFR) 50.69, "Risk-informed categorization and treatment of structures, systems and components for nuclear power reactors."

By email correspondence dated June 1, 2020, the Nuclear Regulatory Commission (NRC) staff requested additional information to complete its review. Enclosure 1 provides the SNC response to the NRC request. Enclosure 2 provides the revised facility operating license (FOL) condition. The conclusions of the No Significant Hazards Consideration and Environmental Consideration contained in the original LAR have been reviewed and are unaffected by this response.

This letter contains no NRC commitments. If you have any questions, please contact Jamie Coleman at 205.992.6611.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 2<sup>nd</sup> day of June 2020.

Respectfully submitted,



C. A. Gayheart  
Director, Regulatory Affairs  
Southern Nuclear Operating Company

CAG/TLE

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Enclosures: 1. Response to NRC RAI  
2. Proposed FOL Conditions

cc: Regional Administrator, Region II  
NRR Project Manager – Hatch  
Senior Resident Inspector – Hatch  
Director, Environmental Protection Division – State of Georgia  
RType: CHA02.004

**Response to Request for Additional Information (RAI) Regarding Application to Adopt  
10 CFR 50.69, "Risk-Informed Categorization and Treatment of Structures, Systems and  
Components for Nuclear Power Reactors"**

**Enclosure 1**

**Response to NRC RAI**

**Request for Additional Information**

*The current third proposed license condition states:*

*“Prior to implementation, SNC shall update the PRA models to reflect the as-built, as-operated plant following installation of the required NFPA 805 modifications, implementation items, and the as-built installation details required to meet the risk acceptance guidelines found in RG 1.174, Revision 3, for transition to NFPA 805. If, prior to the issuance of renewed license amendment dated [DATE], the risk estimates from the updated PRA models do not meet the risk acceptance guidelines found in RG 1.174, Revision 3, measures will be taken to reduce the risk. Measures may include approaches such as plant modifications or analytical updates to the PRA model. If any of the measures taken include the use of an upgrade that have not been Peer Reviewed for use in the Hatch PRA models, a focused scope Peer Review will be conducted.”*

*This license condition leaves much to be determined later and is very unclear as to who has control, who is to do what, what criteria would determine acceptability, and how the NRC staff could take enforcement action.*

*Please revise the license condition (i.e., such as, Prior to implementation of the Renewed License Amendment dated [DATE], Southern Nuclear Operating Company shall update the Probabilistic Risk Assessment (PRA) models to reflect the as-built, as-operated, and as-maintained plant and shall ensure the risk acceptance guidelines found in Regulatory Guide (RG) 1.174, Revision 3 are met).*

**SNC Response**

SNC agrees with the NRC’s proposed license condition revision. See Enclosure 2 for the proposed license condition. The first and second license condition paragraphs remain unchanged. The third license condition paragraph has been revised.

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**Enclosure 2**

**Proposed FOL Conditions**

Facility Operating License Condition Insert:

*Southern Nuclear Operating Company is approved to implement 10 CFR 50.69 using the processes for categorization of Risk-Informed Safety Class (RISC)-1, RISC-2, RISC-3, and RISC-4 structures, systems, and components (SSCs) specified in the renewed license amendment dated [DATE].*

*Prior NRC approval, under 10 CFR 50.90, is required for a change to the categorization process specified above (e.g., change from a seismic margins approach to a seismic probabilistic risk assessment approach).*

*Prior to implementation of the Renewed License Amendment dated [DATE], Southern Nuclear Operating Company shall update the Probabilistic Risk Assessment (PRA) models to reflect the as-built, as-operated, and as-maintained plant and shall ensure the risk acceptance guidelines found in Regulatory Guide (RG) 1.174, Revision 3 are met.*