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Docket Nos.	50-348	50-321	50-424	HL-5702
	50-364	50-366 ✓	50-425	LCV-1276

Mr. John C. Hoyle, Secretary
U. S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudications Staff
Washington, D. C. 20555-0001

Comments on Draft Regulatory Guide DG-4005, "Preparation of Supplemental Environmental Reports for Applications to Renew Nuclear Power Plant Operating Licenses "
(63 Fed. Reg. 42644 dated August 10, 1998)

Dear Mr. Hoyle:

Southern Nuclear Operating Company (SNC) has reviewed the proposed Draft Regulatory Guide, "Preparation of Supplemental Environmental Reports for Applications to Renew Nuclear Power Plant Operating Licenses," published in the Federal Register on August 10, 1998. In accordance with the request for comments, SNC is in total agreement with the NEI comments that are being provided to the NRC. Additionally, the Part 51 Utility Group is providing comments on this document, which we believe to be appropriate and beneficial.

SNC also urges the NRC to consider rulemaking to reclassify the Severe Accident Mitigation Alternatives (SAMAs) from a Category 2 to a Category 1 issue, based on the reasons discussed in Enclosure 1. SNC Plant Hatch would require these considerations early in 1999 to apply any such change into their process for developing a renewal application. The SAMA analysis requires a significant number of man-hours and represents approximately a third of the cost of preparing the Environmental Report (ER) for Plant Hatch. Thus, timely resolution of this issue has a significant impact on SNC's budget and schedule for preparing the ER.

Respectfully submitted,

D. N. Morey

Enclosure
DNM/JTD
cc: (See next page.)

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cc: Southern Nuclear Operating Company
Mr. M. L. Stinson, General Manager - Plant Farley
Mr. P. H. Wells, General Manager - Plant Hatch
Mr. J. T. Gasser, General Manager - Vogtle Electric Generating Plant
Mr. H. L. Sumner, Jr., Vice President - Plant Hatch
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U. S. Nuclear Regulatory Commission, Washington, DC
Mr. J. I. Zimmerman, Licensing Project Manager - Farley
Mr. L. N. Olshan, Project Manager - Hatch
Mr. D. H. Jaffe, Senior Project Manager - Vogtle

U. S. Nuclear Regulatory Commission, Region II
Mr. L. A. Reyes, Regional Administrator
Mr. T. P. Johnson, Senior Resident Inspector - Farley
Mr. J. T. Munday, Senior Resident Inspector - Hatch
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Enclosure 1
Reclassification of SAMA Category

License renewal applicants are currently required by Part 51 to include in their environmental report "a consideration of alternatives to mitigate severe accidents," unless the NRC staff has previously considered severe accident mitigation alternatives (SAMAs) for the particular plant in an environmental impact statement (EIS), EIS supplement, or environmental assessment. See 10 C.F.R. § 51.53(3)(ii)(L). Though the Commission currently treats SAMA analysis as a Category 2 issue for purposes of the environmental report, the Commission has indicated that once the Individual Plant Examination/Individual Plant Examination of External Events (IPE/IPEEE) program is complete, it may reevaluate the SAMA issue for license renewal and consider reclassifying SAMAs as a Category 1 issue.

SNC urges the Commission to reclassify SAMAs as a Category 1 issue. According to Generic Letter 88-20, there are several actions to evaluate potential vulnerabilities in plant performance or design. These alternatives include the IPE and IPEEE, which typically require a licensee to consider potential improvements to reduce the frequency of severe accidents and/or to mitigate the consequences of such accidents. The IPE and IPEEE constitute broad evaluations of mitigation alternatives, including physical plant modifications and improvements to plant procedures. While the IPE/IPEEE evaluations are different than the SAMA analysis, the majority of the analysis is essentially the same activity performed in the site specific SAMA analysis now required for license renewal.

Both the IPE and IPEEE satisfy the intent of the SAMA analysis currently required for license renewal applications. Therefore, it is both reasonable and appropriate to reclassify the SAMA analysis from being a Category 2 issue to a Category 1 issue.

Because the NRC has concluded that existing plants do not pose an undue risk to public health and safety and because implementing additional mitigation alternatives as part of the IPE and IPEEE further reduces the chance of occurrence and/or mitigates the consequences of severe accidents, additional steps to analyze environmental effects are not needed. As a result, the NRC should require applicants to perform a Part 51 SAMA analysis for license renewal only for those plants that have not completed an IPE/IPEEE analysis. For the reasons identified above, SNC requests that the NRC revise Draft Reg. Guide DG-4005 and begin rulemaking to reclassify SAMAs as a Category 1 issue.

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