

June 30, 2021

Docket Nos.: 50-321 50-348 50-424 NL-21-0613
 50-366 50-364 50-425

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

Southern Nuclear Operating Company
Joseph M. Farley Nuclear Plant - Units 1 and 2
Edwin I. Hatch Nuclear Plant - Units 1 and 2
Vogtle Electric Generating Plant - Units 1 and 2

Supplement to License Amendment Request to Revise
Technical Specification 5.7, "High Radiation Area," Administrative Controls

Ladies and Gentlemen:

On March 25, 2021 (ADAMS Accession Number ML21084A003), pursuant to the provisions of Section 50.90 of Title 10 of the Code of Federal Regulations, Southern Nuclear Operating Company (SNC) requested amendments to the Technical Specifications (TS) for Joseph M. Farley Nuclear Plant (FNP), Units 1 and 2, Edwin I. Hatch Nuclear Plant (HNP), Units 1 and 2, and Vogtle Electric Generating Plant (VEGP), Units 1 and 2. The proposed amendments would revise TS 5.0, "Administrative Controls," specifically, TS 5.7, "High Radiation Area," to align with the Standard Technical Specifications in NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 4.0, and NUREG-1433, "Standard Technical Specifications - General Electric BWR/4 Plants," Revision 4.0, as applicable.

Subsequent to the submittal, it was identified that the markups and clean-typed pages for HNP TS 5.7.2 did not match NUREG-1433 Revision 4.0 word-for-word. Related to this issue, SNC also requests exception from NUREG-1431 Revision 4.0 for FNP and VEGP TS 5.7.2. See the enclosure to this letter for explanation.

Attachments 1, 2, and 3 provide clean-typed TS pages for HNP, FNP, and VEGP, respectively, to replace those in the original request that are affected by this supplemental request.

SNC requests the same approval and implementation schedule as requested in its original application. The conclusions of the No Significant Hazards Consideration Determination and Environmental Consideration contained in the original application have been reviewed and are unaffected by this supplement.

This letter contains no regulatory commitments.

In accordance with 10 CFR 50.91, SNC is notifying the State of Alabama and the State of Georgia of this supplement to license amendment request by transmitting a copy of this letter and enclosure to the designated State Officials.

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 30th day of June 2021.

Respectfully submitted,



Cheryl A. Gayheart
Regulatory Affairs Director
Southern Nuclear Operating Company

CAG/tle

Enclosure: Description of Requested Supplemental Changes

Attachments: 1 FNP Revised Technical Specification Page
2. HNP Revised Technical Specification Pages
3. VEGP Revised Technical Specification Page

cc: NRC Regional Administrator, Region II
NRC Project Manager – Farley, Hatch, Vogtle 1 & 2
NRC Senior Resident Inspector – Farley, Hatch, Vogtle 1 & 2
Director, Alabama Office of Radiation Control
Director, Environmental Protection Division – State of Georgia
SNC Document Control RType: CGA02.001

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Enclosure

Description of Requested Supplemental Changes

1.0 Requested Change for FNP and VEGP, Unit 1 and Unit 2, TS 5.7.2

Subsequent to the original request (Reference 1), it was observed that the markups and clean-typed pages for Joseph M. Farley Nuclear Plant (FNP), Units 1 and 2, and Vogtle Electric Generating Plant (VEGP), Units 1 and 2, while matching NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 4.0 do not read well for TS 5.7 paragraph d. The markups and clean-typed pages read:

d. Each individual group entering such an area shall possess:

It is clear to SNC that the word "or" should be between "individual" and "group" in TS 5.7.2 paragraph d. This is based on the following evidence:

1. Although not in NUREG-1431, Revision 4.0, the word "or" does appear in the following Standard Technical Specifications (STS) which are otherwise identical in regard to TS 5.7.2:
 - a. NUREG-1430, "Standard Technical Specifications - Babcock and Wilcox Plants," Revision 4.0
 - b. NUREG-1432, "Standard Technical Specifications - Combustion Engineering Plants," Revision 4.0
 - c. NUREG-1433, "Standard Technical Specifications - General Electric BWR/4 Plants," Revision 4.0
 - d. NUREG-1434, "Standard Technical Specifications - General Electric BWR/6 Plants," Revision 4.0
2. NUREG-1431, Revision 4.0, TS 5.7.1 paragraph d, which is composed similarly to TS 5.7.2 paragraph d, states, "Each individual or group".
3. The Technical Specification Task Force (TSTF) working group has advised SNC that the "or" has been added to TS 5.7.2 paragraph d in the forthcoming Revision 5.0 of NUREG-1431.

As indicated below, with the missing word underlined, SNC would requests to add "or" to its requested change for TS 5.7.2, paragraph d for the FNP Unit 1 and Unit 2, and VEGP Unit 1 and 2 TS.

Supplemental Markup for FNP and VEGP TS 5.7.2:

d. Each individual or group entering such an area shall possess:

Full, clean-typed replacement pages (one each for FNP and VEGP) are provided in Attachments 1 and 3, respectively.

2.0 Requested Change for HNP, Unit 1 and Unit 2, TS 5.7.2

Subsequent to the original request (Reference 1), it was observed that the markups and clean-typed pages for Edwin I. Hatch Nuclear Plant (HNP), Units 1 and 2, contained a typographical error and omitted the word “or” between “individual” and “group” in TS 5.7.2 paragraph d. The word “or” is included in NUREG-1433, “Standard Technical Specifications - General Electric BWR/4 Plants,” Revision 4.0. As indicated below, with the missing word underlined, SNC requests to add “or” to the change for TS 5.7.2, paragraph d for the HNP Unit 1 and Unit 2 TS.

Supplemental Markup for HNP TS 5.7.2:

d. Each individual or group entering such an area shall possess:

Full, clean-typed replacement pages (one each for HNP Unit 1 and HNP Unit 2) are provided in Attachment 2.

3.0 Reference

1. Letter from SNC to NRC Document Control Desk, “License Amendment Request to Revise Technical Specification 5.7, ‘High Radiation Area,’ Administrative Controls,” March 25, 2021 (ADAMS Accession Number ML21084A003)

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Attachment 1

FNP Revised Technical Specification Page

5.7 High Radiation Area

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

- d. Each individual or group entering such an area shall possess:
1. A radiation monitoring device that continuously integrates the radiation rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
 2. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area, or
 3. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter), and
 - (i) Be under surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
 - (ii) Be under surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, or personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area.
 4. In those cases where options (2) and (3), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area.
- e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

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Attachment 2

HNP Revised Technical Specification Pages

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- d. Each individual or group entering such an area shall possess:
1. A radiation monitoring device that continuously integrates the radiation rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
 2. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area, or
 3. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter), and
 - (i) Be under surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
 - (ii) Be under surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, or personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area.
 4. In those cases where options (2) and (3), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area.
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5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

- d. Each individual or group entering such an area shall possess:
1. A radiation monitoring device that continuously integrates the radiation rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
 2. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area, or
 3. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter), and
 - (i) Be under surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
 - (ii) Be under surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, or personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area.
 4. In those cases where options (2) and (3), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area.
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Attachment 3

VEGP Revised Technical Specification Page

5.7 High Radiation Area

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

- d. Each individual or group entering such an area shall possess:
1. A radiation monitoring device that continuously integrates the radiation rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
 2. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area, or
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 - (ii) Be under surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, or personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area.
 4. In those cases where options (2) and (3), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area.
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