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NL-21-0918

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

Edwin I. Hatch Nuclear Plant - Units 1 and 2
License Amendment Request to Revise the NFPA 805 Fire Protection Program

Ladies and Gentlemen:

On June 11, 2020, with corrections dated June 17, 2020, the Nuclear Regulatory Commission (NRC) issued Amendment No. 304 to Renewed Facility Operating License (RFOL) No. DPR-57 and Amendment No. 249 to RFOL No. NPF-5 for Edwin I. Hatch Nuclear Plant (HNP) Units 1 and 2, respectively. These amendments adopted National Fire Protection Association Standard 805 (NFPA 805), "Performance-Based Standards for Fire Protection for Light Water Reactor Electric Generating Plants," 2001 Edition (ADAMS Accession No. ML010800360), as incorporated into Title 10 of the Code of Federal Regulations, Part 50, Section 50.48(c), as the new HNP fire protection licensing basis.

During implementation of the NFPA 805 program at HNP, SNC determined that additional plant modifications were required to comply with these requirements. As discussed during the pre-submittal meeting with NRC Staff on October 5, 2021 (ML21278A557), the plant modifications impact Attachment S2, Table S-2 referenced in the Transition License Conditions of RFOL Nos. DPR-57 and NPF-5. Therefore, in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC), hereby requests an amendment to RFOL No. NPF-5 for HNP Unit 1 and RFOL No. DPR-57 for HNP Unit 2 to reference an updated Table S-2 that reflects these additional plant modifications.

This request is provided in detail in the Enclosure to this letter. Approval is requested within 12 months of completion of the NRC's acceptance review.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Georgia Officials.

This letter contains no new regulatory commitments.

If you should have any questions regarding this submittal, please contact Ryan Joyce at 205.992.6468.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 31st day of March, 2022.

Respectfully submitted,



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

CAG/AGQ

Enclosure: License Amendment Request to Revise NFPA 805 Fire Protection Program

- Attachments:
1. Markup of NL-19-1475 Attachment S2, Table S-2 Plant Modifications Committed (Security-related information)
 2. Clean Version of Revised Attachment S2, Table S-2, Plant Modifications Committed (Security-related information)
 3. Markups of License Conditions
 4. Clean Version of Revised License Conditions
 5. Editorial Corrections to NL-19-1475 Attachment A, Table B-1

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

**Edwin I. Hatch Nuclear Plant – Units 1 and 2
License Amendment Request to Revise NFPA 805 Fire Protection Program**

Enclosure

ENCLOSURE

LICENSE AMENDMENT REQUEST TO REVISE NFPA 805 FIRE PROTECTION PROGRAM

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ATTACHMENTS:

1. Markup of NL-19-1475 Attachment S2, Table S-2, Plant Modifications Committed
2. Clean Version of Revised Attachment S2, Table S-2, Plant Modifications Committed
3. Markups of License Conditions
4. Clean Version of Revised License Conditions
5. Editorial Corrections to LAR Table B-1

1.0 SUMMARY DESCRIPTION

Southern Nuclear Operating Company (SNC) is implementing the National Fire Protection Association (NFPA) 805 program for Hatch Nuclear Plant (HNP) Units 1 and 2 as approved by Nuclear Regulatory Commission (NRC) in letter dated June 11, 2020 (ML20066F592) with corrections in letter dated June 17, 2020 (ML20167A01). This proposed license amendment request (LAR) supersedes the NFPA 805 plant modification scope described in Table S-2 of Attachment S2 to letter NL-19-1475 and changes the license conditions that reference this table. In addition, the Unit 1 and Unit 2 license conditions are updated to clarify the date by which the modifications must be implemented. The guidance of the March 2, 2016 letter from the NRC to the Nuclear Energy Institute (NEI) (Reference 6.3) was used to develop this LAR.

2.0 DETAILED DESCRIPTION

2.1 NRC Guidance for Changes to Approved Modifications

Regulatory Position C.3.1 of RG 1.205, Revision 1, (Reference 6.7), states that a license condition included in a NFPA 805 LAR should include: (1) a list of modifications being made to bring the plant into compliance with 10 CFR 50.48(c); (2) a schedule detailing when these modifications will be completed; and (3) a statement that the licensee shall maintain appropriate compensatory measures in place until implementation of the modifications are completed.

This submittal follows the guidance established by NRC Letter to Michael Tschiltz, (Reference 6.3), specifically Option A. This option evaluates proposed changes using the accepted fire probabilistic risk assessment (PRA) methods and approaches summarized in the final safety evaluation accompanying the license amendment approving transition to NFPA 805. Option A identifies that the licensee should provide the following information:

- i. A summary of all changes to the modifications;
- ii. A summary of all changes to the probabilistic risk assessment (PRA) models and explanation for each change;
- iii. New, updated versions in their entirety of: the License Condition (Attachment M), list of plant modifications (Attachment S), and the summarizing area wide change-in-risk result tables (Attachment W); and
- iv. A statement that the defense-in-depth (DID) and safety margin evaluations associated with the original LAR have been completed on the proposed changes.

The proposed changes include changes to the scope of the NFPA 805 plant modifications described in Attachment S2, Table S-2 of NL-19-1475 dated December 13, 2019.

This Enclosure provides a summary and evaluation of all changes to the modifications.

Attachment 1 provides a markup of Attachment S2, Table S-2 currently referenced in the HNP RFOL Transition License Conditions.

Attachment 2 provides a clean version of the proposed Table S-2 replacement.

Attachment 3 provides a markup of the current applicable License Conditions.

Attachment 4 provides the revised applicable License Conditions.

Attachment 5 provides an update to LAR Attachment A, Table B-1, Chapter 3.11.3(2) Fire Barrier Penetrations to include an additional compliance statement for fire dampers for completeness.

A revised Attachment W is not being provided in this submittal as there were no changes to risk results.

2.2 Current Licensing Basis

HNP Unit 1 RFOL (ML052930172) license condition 2.(C)(3) and HNP Unit 2 RFOL (ML052930177) license condition 2.(C)(3)(a) require SNC to implement and maintain a fire protection program that complies with 10 CFR 50.48(a) and § 50.48(c). Except where NRC approval for changes or deviations is required by § 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, HNP may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in § 50.48(a) and § 50.48(c), the change does not require a change to a technical specification or a license condition, and the specific criteria listed in the license condition are satisfied.

HNP Unit 1 RFOL license condition 2.(C)(3)(c) and HNP Unit 2 RFOL license condition 2.(C)(3)(a)(3), "Transition License Conditions," subparagraphs (2) and b), respectively, state:

"The licensee shall implement the modifications described in Attachment S2, Table S-2, "Plant Modifications Committed," of SNC letter NL-19-1475, dated December 13, 2019, to its facility to complete transition to full compliance with 10 CFR 50.48(c) by the startup of the second refueling outage (for each unit) after issuance of the NRC SE. The licensee shall maintain appropriate compensatory measures in place until completion of the modifications."

The "after issuance of the NRC SE" statement above refers to the NRC SE issued June 2020. Therefore, the modifications are required to be implemented by the startup of Unit 2 refueling outage 2R27 (spring 2023) and Unit 1 refueling outage 1R31 (spring 2024).

2.3 Reasons for the Proposed Changes

During implementation of the NFPA 805 program at HNP, SNC determined that additional plant modifications were required to achieve compliance with NFPA 805. Specifically, SNC determined that there were additional power panels requiring modifications to provide breaker coordination and cable trays requiring additional cable tray covers. Therefore, the list of modifications required to complete the transition to NFPA 805 (described in Attachment S2, Table S-2, "Plant Modifications Committed," of SNC letter NL-19-1475, dated December 13, 2019) must be updated

to include these additional plant modifications. The HNP Unit 1 and Unit 2 RFOL license conditions that refer to this table must also be updated to refer to this updated list of plant modifications.

In addition, the modification description for Table S-2, Item 14 identified that fire dampers would be modified as required to meet the NFPA 90A requirement that fire dampers be installed in accordance with the condition of their approval and manufacturer's instructions. SNC plans to perform additional fire tests of the as-installed fire damper configurations in accordance with Generic Letter 86-10, Supplement 1. A performance-based analysis will be performed based on the additional fire test results to assess the adequacy of the fire barrier forming the fire area boundary to demonstrate that the barrier can withstand the effects of the hazards in the area in accordance with NFPA 805, Section 3.11.3. The performance-based analysis will also determine if any additional fire damper modifications are required to demonstrate that the barrier can withstand the effects of the hazards in the area.

Lastly, to avoid confusion over the required implementation period, the words "the second refueling outage (for each unit) after issuance of the NRC SE" are changed to explicitly state the refueling outage for each unit. SNC is not requesting to change the implementation period as part of this amendment.

2.4 Description of the Proposed Change

HNP Unit 1 RFOL license condition 2.(C)(3) and HNP Unit 2 RFOL license condition 2.(C)(3)(a), "Fire Protection," as follows (double underline indicates inserted text):

Southern Nuclear Operating Company shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the licensee amendment request dated April 4, 2018, supplemented by letters dated May 28, August 9, October 7, and December 13, 2019, and February 5, and March 13, 2020, and license amendment request dated March XX, 2022, and as approved in the NRC safety evaluations (SE) dated June 11, 2020 and . Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

HNP Unit 1 RFOL license condition 2.(C)(3)(c) and HNP Unit 2 RFOL license condition 2.(C)(3)(a)(3), "Transition License Conditions," subparagraphs (2) and b) , respectively, as follows (strikethrough indicates deleted text, and double underline indicates inserted text):

"The licensee shall implement the modifications described in Attachment ~~S22~~, Table S-2, "Plant Modifications Committed," of SNC letter ~~NL-19-1475~~NL-21-0918, dated ~~December 13, 2019~~March XX, 2022, to its facility to complete

transition to full compliance with 10 CFR 50.48(c) by the startup of ~~the second refueling outage (for each unit) after issuance of the NRC SE~~Unit 2 refueling outage 2R27 (spring 2023) and Unit 1 refueling outage 1R31 (spring 2024).
The licensee shall maintain appropriate compensatory measures in place until completion of the modifications.”

HNP Unit 1 RFOL license condition 2.(C)(3)(c)(3) and HNP Unit 2 RFOL license condition 2.(C)(3)(a)(3)c, “Transition License Conditions,” as follows (strikethrough indicates deleted text, and double underline indicates inserted text):

The licensee shall implement items listed in Attachment S2, Table S-3, “Implementation Items,” of SNC letter NL-19-1475, dated December 13, 2019, with 365 days after issuance of the NRC SE. An exception to this statement is for completion date for Implementation Item IMP-19. This item will be completed for each unit at a time not to exceed 180 days after all modifications for the respective unit (as listed in Attachment ~~S2~~, Table S-2, “Plant Modifications Committed,” of SNC letter NL-21-0918, dated March XX, 2022) are operable.

3.0 TECHNICAL EVALUATION

The proposed changes include changes to the scope of the NFPA 805 plant modifications described in Attachment S2, Table S-2 of NL-19-1475 dated December 13, 2019.

During the NFPA 805 transition period the following modification scope additions and clarifications were identified:

3.1 Breaker Coordination Modifications

Proposed Change:

Revise Attachment S2, Table S-2 Item numbers 6 and 7 “Proposed Modification” to modify breakers as required to ensure coordination with upstream feeder breaker in accordance with NFPA 805 Section 2.4.2.2.2(a). The affected breakers are listed in Attachment 2 (the revised Attachment S2, Table S-2).

Basis for Change:

A risk analysis was performed on the panels that were found to be uncoordinated. For the first phase of the analysis, basic events were chosen that were either directly tied to the uncoordinated panels or indirectly tied to the panels (equipment that was powered by the impacted panel and was required for the specific credited function). The impacted basic events were identified through a review of the required power supplies, specifically for the function of the equipment. If the loss of power for an equipment function state resulted in the desired end state, then the associated basic event was not included in the failure list. This conservative method evaluates the risk impact of failing the electrical panels for all fires, not just ones that impacted the load cables of the uncoordinated panels.

For the no more than minimal risk impact criteria, SNC chose a value of 1E-08/year for Delta Core Damage Frequency (CDF) and 1E-09/year Delta Large Early Release Frequency (LERF). These risk values were chosen because they are a decade lower than the thresholds that will be allowed after self-approval and less than 0.1% of the total fire risk. For the panels below the value of 1E-08/year for Delta CDF and 1E-09/year delta LERF, there was no further analysis done, since even with the conservative method used in the first analysis they had no more than minimal risk.

For the panels that were above the value of 1E-08/year for Delta CDF and 1E-09/year Delta LERF, a second phase (more refined analysis) was performed. The second analysis identified all load cables that could cause breaker coordination issues and failed those panels when any of the load cables were impacted by fire. This analysis conservatively assumed that any time the load cable was impacted by fire the upstream panel would be lost. Panels that were found to have a more than minimal risk impact from the second, more refined analysis, were added to the Modification scope to fix the coordination issue.

A final run was also done that concurrently failed all of the panels that individually had a no more than minimal risk impact. This additional run also resulted in a no more than minimal risk impact. In other words, all of the panels that were determined not to require a plant modification were all failed concurrently, and the Delta risk was still below 1E-08/year Delta CDF and 1E-09/year Delta LERF.

The PRA relied on in the proposed LAR is the same as the PRA that was accepted for the NFPA 805 transition. There is no impact to the PRA as the panels that were found to have a more than minimal risk impact will have the coordination issues resolved before self-approval, and those with less than a minimal impact were found to not impact the PRA results.

Based on the analyses described in the preceding paragraphs of this section, it was determined that additional breaker coordination modifications were required beyond those identified in Attachment S2, Table S-2, Items 6 and 7 of SNC letter NL-19-1475, dated December 13, 2019. The additional breaker modifications resolve coordination issues in which a fault on a load breaker could result in the upstream feeder breaker tripping prior to the load breaker tripping.

3.2 Cable Tray Cover Modifications

Proposed Change:

Add new item, Item number 15, to Attachment S2, Table S-2 to install cable tray covers in the Cable Spread Room as required by the Fire PRA. The three affected cable trays are listed in Attachment 2 (the revised Attachment S2, Table S-2).

Basis for Change:

The Fire PRA credits cable tray cover configurations to limit fire growth. Field verifications identified three cable trays where the covers were not installed as required by Fire PRA evaluations.

3.3 Fire Damper Modifications:

Proposed Change:

Clarification of the modification scope for Table S-2, Item 14 is necessary to identify that performance of fire testing will be utilized to demonstrate that the barrier can withstand the effects of the hazards in the area in accordance with NFPA 805, Section 3.11.3. The performance-based analysis will also determine if any additional fire damper modifications are required to demonstrate that the barrier can withstand the effects of the hazards in the area.

Basis for Change:

The modification description for Table S-2, Item 14 identified that fire dampers would be modified as required to meet the NFPA 90A requirement that fire dampers be installed in accordance with the condition of their approval and manufacturer's instructions. SNC plans to perform additional fire tests of the as-installed fire damper configurations in accordance with Generic Letter 86-10, Supplement 1. A performance-based analysis will be performed based on the additional fire test results to assess the adequacy of the fire barrier forming the fire area boundary to demonstrate that the barrier can withstand the effects of the hazards in the area in accordance with NFPA 805, Section 3.11.3. The performance-based analysis will also determine if any additional fire damper modifications are required to demonstrate that the barrier can withstand the effects of the hazards in the area.

As provided in letter NL-18-0282 and updated in letters NL-19-0536, NL-19-0985, and NL-19-1475, LAR Attachment A – NEI 04-02 Table B-1 – Transition of Fundamental FP Program and Design Elements, NFPA 805 Chapter 3.11.3(2) identifies that Hatch's Compliance Statement for NFPA 90A as "Complies with Use of EEEE's." Engineering evaluations have been developed as noted in the compliance basis, however Table S-2, Item 14 addresses actions required to resolve a NFPA code deviation and therefore this section of Table B-1 should have also included a Compliance Statement of "Complies with Required Action." Attachment 5 provides an update to Table B-1 for Chapter 3.11.3(2) to reference Table S-2, Item 14.

3.4 Defense-in-Depth/Safety Margin Discussion

The modification additions and clarification contained in this LAR supplement do not impact the Defense-In-Depth (DID) or the Safety Margins that were evaluated previously in the original NFPA 805 License Amendment Request.

These changes do not impact the DID Echelons capability of (1) preventing fire from starting; (2) rapidly detecting fires and controlling and extinguishing promptly those fires that do occur, thereby limiting damage; and (3) providing an adequate level of fire protection for structures, systems, or components (SSCs) important to safety, so that a fire that is not promptly extinguished will not prevent essential safety functions from being performed.

Safety Margins are maintained through use of (1) codes and standards or their alternatives accepted for use by the NRC are met, and (2) safety analysis acceptance criteria in the licensing basis are met or sufficient margin is provided to account for analysis and data uncertainty.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

10 CFR 50.48(a)(1) requires that each holder of an operating license have a fire protection plan (FPP) that satisfies General Design Criterion (GDC) 3, "Fire Protection," of Appendix A to 10 CFR Part 50, "General Design Criteria for Nuclear Power Plants."

10 CFR 50.48(c) incorporates NFPA 805 (2001 Edition) by reference, with certain exceptions, modifications, and supplementation.

10 CFR 50.48(c)(3)(ii) states:

The licensee shall complete its implementation of the methodology in Chapter 2 of NFPA 805 (including all required evaluations and analyses) and, upon completion, modify the fire protection plan required by paragraph (a) of this section to reflect the licensee's decision to comply with NFPA 805, before changing its fire protection program or nuclear power plant as permitted by NFPA 805.

Appendix A to 10 CFR Part 50, GDC 3, states, in part:

Structures, systems, and components important to safety shall be designed and located to minimize, consistent with other safety requirements, the probability and effect of fires and explosions. Noncombustible and heat resistant materials shall be used wherever practical throughout the unit, particularly in locations such as the containment and control room.

The Hatch Nuclear Plant proposed amendment request supports the transition to NFPA 805, Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants (2001 Edition), in that it complies with the requirements in fire protection regulations 10 CFR 50.48(a), 10 CFR 50.48(c), and GDC 3 of 10 CFR Part 50, Appendix A.

4.2 Precedent

None.

4.3 No Significant Hazards Consideration Analysis

Southern Nuclear Operating Company (SNC) has evaluated the proposed changes using the criteria in 10 CFR 50.92 and has determined that the proposed changes do not involve a significant hazards consideration.

SNC proposes a change to the Hatch Nuclear Plant Unit 1 and 2 Renewed Facility Operating Licenses to update the scope of the required National Fire Protection Association (NFPA) 805 related plant modifications.

SNC has included the risk impacts of these changes.

As required by 10 CFR 50.91(a), SNC analysis of the issue of no significant hazards consideration using the standards in 10 CFR 50.92 is presented below.

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The purpose of this amendment is to provide updated information associated with the modifications that were described and committed to in the Hatch Nuclear Plant License Amendment Request and subsequently approved by the NRC. The NRC considers that NFPA 805 provides an acceptable methodology and performance criteria for licensees to identify fire protection requirements that are an acceptable alternative to the 10 CFR Part 50, Appendix R, fire protection features (69 FR 33536; June 16, 2004).

Operation of Hatch Nuclear Plant in accordance with the proposed amendment does not result in a significant increase in the probability or consequences of accidents previously evaluated. The proposed amendment does not affect accident initiators or precursors as described in the Hatch Nuclear Plant Final Safety Analysis Report (FSAR), nor does it adversely alter design assumptions, conditions, or configurations of the facility, and it does not adversely impact the ability of structures, systems, or components (SSCs) to perform their intended function to mitigate the consequences of accidents described and evaluated in the FSAR. The proposed amendment does not adversely alter safety-related systems nor affect the way in which safety-related systems perform their functions as required by the accident analysis. The SSCs required to safely shut down the reactor and to maintain it in a safe shutdown condition will remain capable of performing the associated design functions.

Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed amendment does not introduce new or different accident initiators, nor does it alter design assumptions, conditions or configurations of the facility. The proposed amendment does not adversely affect the ability of structures, systems, or components to perform their design function. Structures, systems, or components required to safely shutdown the reactor and maintain it in a safe shutdown condition remain capable of performing their design functions.

Implementation of the risk-informed, performance-based fire protection licensing basis, with the revised modifications complies with the requirements in 10 CFR 50.48(a) and 10 CFR 50.48(c), as well as the guidance contained in

Regulatory Guide 1.205, and does not result in new or different kinds of accidents. The requirements in NFPA 805 address only fire protection and the impact of fire effects on the plant have been evaluated. The proposed amendment does not involve new failure mechanisms or malfunctions that could initiate a new or different kind of accident beyond those already analyzed in the FSAR.

Therefore, this change does not create the possibility of a new or different kind of accident from an accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No

The proposed amendment has been evaluated to ensure that risk and safety margins are maintained within acceptable limits. The risk evaluations for plant changes, in relation to the potential for reducing a safety margin, were measured quantitatively for acceptability using the delta risk (i.e., change in core damage frequency and change in large early release frequency) criteria from Section 5.3.5, "Acceptance Criteria," of NEI 04-02, "Guidance for Implementing a Risk -Informed, Performance-based Fire Protection Program under 10 CFR 50.48(c)," as well as the guidance contained in Regulatory Guide 1.205. Engineering analyses, which may include engineering evaluations, probabilistic safety assessments, and fire modeling calculations, have been performed to demonstrate that the performance-based methods of NFPA 805 do not result in a significant reduction in the margin of safety.

Therefore, this change does not involve a significant reduction in a margin of safety.

4.3 Conclusion

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental

impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 REFERENCES

1. John Lamb, NRC, Letter to C. Gayheart, Edwin I. Hatch Nuclear Plant, Units 1 And 2 – Correction Of Amendment Nos. 304 And 249 Regarding License Amendment Request To Adopt NFPA-805 Performance-Based Standard For Fire Protection For Light Water Reactor Electric Generating Plants (2001 Edition) (EPID L-2018-LLA-0107) (ML20066F592)
2. Public Meeting October 5, 2021, Pre-Application Meeting with Southern Nuclear Operating Company (SNC) to discuss a proposed license amendment regarding NFPA 805 for Hatch Nuclear Plant, Unit 1 & 2 (ML21278A557)
3. Anne Boland, NRC, Letter to Michael Tschiltz, “Recommended Content for License Amendment Requests that Seek Changes to License Conditions That Were Established in Amendments to Adopt National Fire Protection Association Standard 805 But Have Yet to be Fully Implemented,” dated March 2, 2016. (ML16015A416)
4. Regulatory Guide 1.200, “An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities,” Revision 2, U.S. Nuclear Regulatory Commission, Washington, DC, March 2009 (ML090410014)
5. National Fire Protection Association Standard 805, “Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants,” 2001 Edition, Quincy, MA
6. Regulatory Guide 1.174, “An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis,” Revision 3, U.S. Nuclear Regulatory Commission, Washington, DC, January 2018 (ML17317A256)
7. Regulatory Guide 1.205, “Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants,” Revision 1, U.S. Nuclear Regulatory Commission, Washington, DC, December 2009 (ML092730314)
8. NEI 04-02 “Guidance For Implementing A Risk-Informed, Performance-Based Fire Protection Program Under 10 CFR 50.48(c),” Revision 2, Nuclear Energy Institute, Washington, DC, April 2008 (ML081130188)

**Edwin I. Hatch Nuclear Plant - Units 1 and 2
License Amendment Request to Revise NFPA 805 Fire Protection Program**

Attachment 1

**Markup of NL-19-1475 Attachment S2, Table S-2, Plant Modifications Committed
(Security-related information)**

**Edwin I. Hatch Nuclear Plant - Units 1 and 2
License Amendment Request to Revise NFPA 805 Fire Protection Program**

Attachment 2

**Clean Version of Revised NL-19-1475 Attachment S2, Table S-2,
Plant Modifications Committed (Security-related information)**

**Edwin I. Hatch Nuclear Plant - Units 1 and 2
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Attachment 3

Markups of License Conditions

for sample analysis or instrument calibration, or associated with radioactive apparatus or components

- (6) Southern Nuclear, pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.
- (C) This renewed license shall be deemed to contain, and is subject to, the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Section 50.54 of Part 50, and Section 70.32 of Part 70; all applicable provisions of the Act and the rules, regulations, and orders of the Commission now or hereafter in effect; and the additional conditions specified or incorporated below:

(1) Maximum Power Level

Southern Nuclear is authorized to operate the facility at steady-state reactor core power levels not in excess of 2,804 megawatts thermal.

(2) Technical Specifications

The Technical Specifications (Appendix A) and the Environmental Protection Plan (Appendix B), as revised through Amendment No. 314, are hereby incorporated in the renewed license. Southern Nuclear shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

The Surveillance Requirement (SR) contained in the Technical Specifications and listed below, is not required to be performed immediately upon implementation of Amendment No. 195. The SR listed below shall be successfully demonstrated before the time and condition specified:

SR 3.8.1.18 shall be successfully demonstrated at its next regularly scheduled performance.

(3) Fire Protection

Southern Nuclear Operating Company shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the licensee amendment request dated April 4, 2018, supplemented by letters dated May 28, August 9, October 7, and December 13, 2019, and February 5, and March 13, 2020, and license amendment request dated March XX, 2022, and as approved in the NRC safety evaluations (SE) dated June 11, 2020 and . Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

acceptable because the alternative is "adequate for the hazard." Prior NRC review and approval would not be required for alternatives to four specific sections of NFPA 805, Chapter 3, for which an engineering evaluation demonstrates that the alternative to the Chapter 3 elements is adequate for the hazard. A qualified fire protection engineer shall perform the engineering evaluation and conclude that the change has not affected the component, system, procedure, or physical arrangement functionality using a relevant technical requirement or standard. The four specific sections of NFPA 805, Chapter 3, are:

- Fire Alarm and Detection Systems (Section 3.8);
- Automatic and Manual Water-Based Fire Suppression Systems (Section 3.9);
- Gaseous Fire Suppression Systems (Section 3.10); and,
- Passive Fire Protection Features (Section 3.11).

This License Condition does not apply to any demonstration of equivalency under Section 1.7 of NFPA 805.

(2) Fire Protection Program Changes that Have No More than Minimal Risk Impact

Prior NRC review and approval are not required for changes to the licensee's fire protection program that have been demonstrated to have no more than a minimal risk impact. The licensee may use its screening process as approved in NRC SE dated June 11, 2020 to determine that certain fire protection program changes meet the minimal criterion. The licensee shall ensure that fire protection defense-in-depth and safety margins are maintained when changes are made to the fire protection program.

(c) Transition License Conditions

(1) Before achieving full compliance with 10 CFR 50.48(c), as specified by (2) and (3) below, risk-informed changes to the licensee's fire protection program may not be made without prior NRC review and approval unless the change has been demonstrated to have no more than a minimal risk impact, as described in (b)(2) above.

(2) The licensee shall implement the modifications described in Attachment S2, Table S-2, "Plant Modifications Committed," of SNC letter [NL-19-1475/NL-21-0918](#), dated ~~December 13, 2019~~ [March XX, 2022](#), to its facility to complete transition to full compliance with 10 CFR 50.48(c) by the startup of ~~the second refueling outage (for each unit) after the issuance of the NRC SE~~ [Unit 2 refueling outage 2R27 \(spring 2023\) and Unit 1 refueling outage 1R31 \(spring 2024\)](#). The licensee shall maintain appropriate compensatory measures in place until completion of

Note: These words are not actually being pushed onto this page. They just appear to be because deleted text on previous page is still shown for the purpose of markups.

these modifications.

- (3) The licensee shall implement the items listed in Attachment S2, Table S-3, "Implementation Items," of SNC letter NL-19-1475, dated December 13, 2019, with 365 days after the issuance of the NRC SE. An exception to this statement is for the completion date for Implementation Item IMP-19. This item will be completed for each unit at a time not to exceed 180 days after all modifications for the respective unit (as listed in Attachment S2, Table S-2, "[Plant Modifications Committed,](#)" of [SNC letter NL-21-0918, dated March XX, 2022](#)) are operable.

(4.a) Physical Protection

Southern Nuclear shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans, including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plan is entitled: "Southern Nuclear Operating Company Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan," with revisions submitted through May 15, 2006.

Southern Nuclear shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Southern Nuclear CSP was approved by License Amendment No. 265, as supplemented by a change approved by License Amendment No. 274.

(4.b) Mitigation Strategy License Condition

Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

- (a) Fire fighting response strategy with the following elements:
1. Pre-defined coordinated fire response strategy and guidance
 2. Assessment of mutual aid fire fighting assets
 3. Designated staging areas for equipment and materials
 4. Command and control
 5. Training of response personnel
- (b) Operations to mitigate fuel damage considering the following:
1. Protection and use of personnel assets
 2. Communications
 3. Minimizing fire spread
 4. Procedures for implementing integrated fire response strategy

- (6) Southern Nuclear, pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.
- (C) This renewed license shall be deemed to contain, and is subject to, the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Section 50.54 of Part 50, and Section 70.32 of Part 70; all applicable provisions of the Act and the rules, regulations, and orders of the Commission now or hereafter in effect; and the additional conditions² specified or incorporated below:

(1) Maximum Power Level

Southern Nuclear is authorized to operate the facility at steady state reactor core power levels not in excess of 2,804 megawatts thermal, in accordance with the conditions specified herein.

(2) Technical Specifications

The Technical Specifications (Appendix A) and the Environmental Protection Plan (Appendix B); as revised through Amendment No. 259 are hereby incorporated in the renewed license. Southern Nuclear shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) Additional Conditions

The matters specified in the following conditions shall be completed to the satisfaction of the Commission within the stated time periods following the issuance of the renewed license or within the operational restrictions indicated. The removal of these conditions shall be made by an amendment to the license supported by a favorable evaluation by the Commission.

(a) Fire Protection

Southern Nuclear Operating Company shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the licensee amendment request dated April 4, 2018, supplemented by letters dated May 28, August 9, October 7, and December 13, 2019, and February 5, and March 13, 2020, and license amendment request dated March XX, 2022, and as approved in the NRC safety evaluation_s (SE) dated June 11, 2020 and . Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement

² The original licensee authorized to possess, use, and operate the facility with Georgia Power Company (GPC). Consequently, certain historical references to GPC remain in certain license conditions.

Note: The only change to this page is the word "would" got rolled to this page. Therefore, page 5 of the license will get replaced, and the Amendment No. in the footer will have a revision bar to indicate the page changed due to page roll.

would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

(1) Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be acceptable to the NRC and shall be appropriate for the nature and scope of the change being evaluated; be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant. Acceptable methods to assess the risk of the change may include methods that have been used in the peer-reviewed fire PRA model, methods that have been approved by NRC through a plant-specific license amendment or NRC approval of generic methods specifically for use in NFPA 805 risk assessments, or methods that have been demonstrated to bound the risk impact.

- a) Prior NRC review and approval is not required for changes that clearly result in a decrease in risk. The proposed change must also be consistent with the defense in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.
- b) Prior NRC review and approval is not required for individual changes that result in a risk increase less than 1×10^{-7} /year (yr) for CDF and less than 1×10^{-8} /yr for LERF. The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.

(2) Other Changes that May Be Made Without Prior NRC Approval

a) Changes to NFPA 805, Chapter 3, Fundamental Fire Protection Program

Prior NRC review and approval are not required for changes to the NFPA 805, Chapter 3, fundamental fire protection program elements and design requirements for which an engineering evaluation demonstrates that the alternative to the Chapter 3 element is functionally equivalent or adequate for the hazard. The licensee may use an engineering evaluation to demonstrate that a change to an NFPA 805,

licensee's fire protection program may not be made without prior NRC review and approval unless the change has been demonstrated to have no more than a minimal risk impact, as described in (2)(b) above.

- b) The licensee shall implement the modifications described in Attachment S2, Table S-2, "Plant Modifications Committed," of SNC letter ~~NL-19-1475~~[NL-21-0918](#), dated ~~December 13, 2019~~[March XX, 2022](#), to its facility to complete transition to full compliance with 10 CFR 50.48(c) by the startup of ~~the second refueling outage (for each unit) after the issuance of the NRC SE~~[Unit 2 refueling outage 2R27 \(spring 2023\) and Unit 1 refueling outage 1R31 \(spring 2024\)](#). The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.
- c) The licensee shall implement the items as listed in Attachment S2, Table S-3, "Implementation Items," of SNC letter NL-19-1475, dated December 13, 2019, within 365 days after the issuance of the NRC SE. An exception to this statement is for the completion date for Implementation Item IMP-19. This item will be completed for each unit at a time not to exceed 180 days after all modifications for the respective unit (as listed in Attachment S2, Table S-2, "[Plant Modifications Committed](#)," of SNC letter [NL-21-0918](#), dated [March XX, 2022](#)) are operable.

(b.1) Physical Protection

Southern Nuclear shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans, including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plan is entitled: "Southern Nuclear Operating Company Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan," with revisions submitted through May 15, 2006.

Southern Nuclear shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Southern Nuclear CSP was approved by License Amendment No. 209, as supplemented by a change approved by License Amendment No. 219.

**Edwin I. Hatch Nuclear Plant - Units 1 and 2
License Amendment Request to Revise NFPA 805 Fire Protection Program**

Attachment 4

Clean Version of Revised License Conditions

for sample analysis or instrument calibration, or associated with radioactive apparatus or components

- (6) Southern Nuclear, pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.
- (C) This renewed license shall be deemed to contain, and is subject to, the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Section 50.54 of Part 50, and Section 70.32 of Part 70; all applicable provisions of the Act and the rules, regulations, and orders of the Commission now or hereafter in effect; and the additional conditions specified or incorporated below:

(1) Maximum Power Level

Southern Nuclear is authorized to operate the facility at steady-state reactor core power levels not in excess of 2,804 megawatts thermal.

(2) Technical Specifications

The Technical Specifications (Appendix A) and the Environmental Protection Plan (Appendix B), as revised through Amendment No. , are hereby incorporated in the renewed license. Southern Nuclear shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

The Surveillance Requirement (SR) contained in the Technical Specifications and listed below, is not required to be performed immediately upon implementation of Amendment No. 195. The SR listed below shall be successfully demonstrated before the time and condition specified:

SR 3.8.1.18 shall be successfully demonstrated at its next regularly scheduled performance.

(3) Fire Protection

Southern Nuclear Operating Company shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the licensee amendment request dated April 4, 2018, supplemented by letters dated May 28, August 9, October 7, and December 13, 2019, and February 5, and March 13, 2020, and license amendment request dated March XX, 2022, and as approved in the NRC safety evaluations (SE) dated June 11, 2020 and . Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

acceptable because the alternative is "adequate for the hazard." Prior NRC review and approval would not be required for alternatives to four specific sections of NFPA 805, Chapter 3, for which an engineering evaluation demonstrates that the alternative to the Chapter 3 elements is adequate for the hazard. A qualified fire protection engineer shall perform the engineering evaluation and conclude that the change has not affected the component, system, procedure, or physical arrangement functionality using a relevant technical requirement or standard. The four specific sections of NFPA 805, Chapter 3, are:

- Fire Alarm and Detection Systems (Section 3.8);
- Automatic and Manual Water-Based Fire Suppression Systems (Section 3.9);
- Gaseous Fire Suppression Systems (Section 3.10); and,
- Passive Fire Protection Features (Section 3.11).

This License Condition does not apply to any demonstration of equivalency under Section 1.7 of NFPA 805.

(2) Fire Protection Program Changes that Have No More than Minimal Risk Impact

Prior NRC review and approval are not required for changes to the licensee's fire protection program that have been demonstrated to have no more than a minimal risk impact. The licensee may use its screening process as approved in NRC SE dated June 11, 2020 to determine that certain fire protection program changes meet the minimal criterion. The licensee shall ensure that fire protection defense-in-depth and safety margins are maintained when changes are made to the fire protection program.

(c) Transition License Conditions

(1) Before achieving full compliance with 10 CFR 50.48(c), as specified by (2) and (3) below, risk-informed changes to the licensee's fire protection program may not be made without prior NRC review and approval unless the change has been demonstrated to have no more than a minimal risk impact, as described in (b)(2) above.

(2) The licensee shall implement the modifications described in Attachment 2, Table S-2, "Plant Modifications Committed," of SNC letter NL-21-0918, dated March XX, 2022, to its facility to complete transition to full compliance with 10 CFR 50.48(c) by the startup of Unit 2 refueling outage 2R27 (spring 2023) and Unit 1 refueling outage 1R31 (spring 2024). The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.

- (3) The licensee shall implement the items listed in Attachment S2, Table S-3, "Implementation Items," of SNC letter NL-19-1475, dated December 13, 2019, with 365 days after the issuance of the NRC SE. An exception to this statement is for the completion date for Implementation Item IMP-19. This item will be completed for each unit at a time not to exceed 180 days after all modifications for the respective unit (as listed in Attachment 2, Table S-2, "Plant Modifications Committed," of SNC letter NL-21-0918, dated March XX, 2022) are operable.

(4.a) Physical Protection

Southern Nuclear shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans, including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plan is entitled: "Southern Nuclear Operating Company Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan," with revisions submitted through May 15, 2006.

Southern Nuclear shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Southern Nuclear CSP was approved by License Amendment No. 265, as supplemented by a change approved by License Amendment No. 274.

(4.b) Mitigation Strategy License Condition

Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

- (a) Fire fighting response strategy with the following elements:
 - 1. Pre-defined coordinated fire response strategy and guidance
 - 2. Assessment of mutual aid fire fighting assets
 - 3. Designated staging areas for equipment and materials
 - 4. Command and control
 - 5. Training of response personnel
- (b) Operations to mitigate fuel damage considering the following:
 - 1. Protection and use of personnel assets
 - 2. Communications
 - 3. Minimizing fire spread
 - 4. Procedures for implementing integrated fire response strategy

- (6) Southern Nuclear, pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.
- (C) This renewed license shall be deemed to contain, and is subject to, the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Section 50.54 of Part 50, and Section 70.32 of Part 70; all applicable provisions of the Act and the rules, regulations, and orders of the Commission now or hereafter in effect; and the additional conditions² specified or incorporated below:

(1) Maximum Power Level

Southern Nuclear is authorized to operate the facility at steady state reactor core power levels not in excess of 2,804 megawatts thermal, in accordance with the conditions specified herein.

(2) Technical Specifications

The Technical Specifications (Appendix A) and the Environmental Protection Plan (Appendix B); as revised through Amendment No. are hereby incorporated in the renewed license. Southern Nuclear shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) Additional Conditions

The matters specified in the following conditions shall be completed to the satisfaction of the Commission within the stated time periods following the issuance of the renewed license or within the operational restrictions indicated. The removal of these conditions shall be made by an amendment to the license supported by a favorable evaluation by the Commission.

(a) Fire Protection

Southern Nuclear Operating Company shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the licensee amendment request dated April 4, 2018, supplemented by letters dated May 28, August 9, October 7, and December 13, 2019, and February 5, and March 13, 2020, and license amendment request dated March XX, 2022, and as approved in the NRC safety evaluations (SE) dated June 11, 2020 and . Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement

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would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

(1) Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be acceptable to the NRC and shall be appropriate for the nature and scope of the change being evaluated; be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant. Acceptable methods to assess the risk of the change may include methods that have been used in the peer-reviewed fire PRA model, methods that have been approved by NRC through a plant-specific license amendment or NRC approval of generic methods specifically for use in NFPA 805 risk assessments, or methods that have been demonstrated to bound the risk impact.

- a) Prior NRC review and approval is not required for changes that clearly result in a decrease in risk. The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.
- b) Prior NRC review and approval is not required for individual changes that result in a risk increase less than 1×10^{-7} /year (yr) for CDF and less than 1×10^{-8} /yr for LERF. The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.

(2) Other Changes that May Be Made Without Prior NRC Approval

- a) Changes to NFPA 805, Chapter 3, Fundamental Fire Protection Program

Prior NRC review and approval are not required for changes to the NFPA 805, Chapter 3, fundamental fire protection program elements and design requirements for which an engineering evaluation demonstrates that the alternative to the Chapter 3 element is functionally equivalent or adequate for the hazard. The licensee may use an engineering evaluation to demonstrate that a change to an NFPA 805,

licensee's fire protection program may not be made without prior NRC review and approval unless the change has been demonstrated to have no more than a minimal risk impact, as described in (2)(b) above.

- b) The licensee shall implement the modifications described in Attachment 2, Table S-2, "Plant Modifications Committed," of SNC letter NL-21-0918, dated March XX, 2022, to its facility to complete transition to full compliance with 10 CFR 50.48(c) by the startup of Unit 2 refueling outage 2R27 (spring 2023) and Unit 1 refueling outage 1R31 (spring 2024). The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.
- c) The licensee shall implement the items as listed in Attachment S2, Table S-3, "Implementation Items," of SNC letter NL-19-1475, dated December 13, 2019, within 365 days after the issuance of the NRC SE. An exception to this statement is for the completion date for Implementation Item IMP-19. This item will be completed for each unit at a time not to exceed 180 days after all modifications for the respective unit (as listed in Attachment 2, Table S-2, "Plant Modifications Committed," of SNC letter NL-21-0918, dated March XX, 2022) are operable.

(b.1) Physical Protection

Southern Nuclear shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans, including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plan is entitled: "Southern Nuclear Operating Company Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan," with revisions submitted through May 15, 2006.

Southern Nuclear shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Southern Nuclear CSP was approved by License Amendment No. 209, as supplemented by a change approved by License Amendment No. 219.

**Edwin I. Hatch Nuclear Plant - Units 1 and 2
License Amendment Request to Revise NFPA 805 Fire Protection Program**

Attachment 5

Editorial Corrections to NL-19-1475 Attachment A, Table B-1

NFPA 805 Ch. 3 Ref.	Requirements/Guidance	Compliance Statement	Compliance Basis	Reference Document
		Complies, with Required Action	Fusible links will be relocated and/or installed on sliding fire doors in compliance with the requirements of NFPA 80. (See Attachment S, Table S-2, Item 1.)	None
3.11.3(2) Fire Barrier Penetrations.	NFPA 90A, Standard for the Installation of Air-Conditioning and Ventilating Systems	Complies with Use of EEEE's	<p>Fire dampers are in accordance with NFPA 90A, Standard for the Installation of Air-Conditioning and Ventilating Systems, as identified in Calculation SMNH-16-039, NFPA 90A Code Compliance Review.</p> <p>Calculation SMNH-16-059 documents the acceptability of fire area boundaries within the Unit 1 and Unit 2 Reactor Buildings, including HVAC openings lacking dampers.</p> <p>Calculation SMNH-16-060 documents the acceptability of fire area boundaries within the Unit 1 and Unit 2 Turbine Buildings, including HVAC openings lacking dampers.</p> <p>Calculation SMNH-16-061 documents the acceptability of fire area boundaries within the Control Building, including HVAC openings lacking dampers.</p>	<p>Calculation SMNH-16-039, NFPA 90A Code Compliance Review, Ver. 1 / All</p> <p>Calculation SMNH-16-059, Engineering Evaluation of Fire Area Boundaries within the Unit 1 and Unit 2 Reactor Buildings, Ver. 1 / All</p> <p>Calculation SMNH-16-060, Engineering Evaluation of Fire Area Boundaries within the Unit 1 and Unit 2 Turbine Buildings, Ver. 1 / All</p> <p>Calculation SMNH-16-061, Engineering Evaluation of Fire Area Boundaries within the Control Building, Ver. 1 / All</p> <p>NFPA 90A, Standard for the Installation of Air Conditioning and Ventilating Systems, 1976 Edition / All</p> <p>Procedure 52GM-FPX-001-0, HVAC Fire Damper Installation and Repair, Ver. 2.4 / All</p>
		Complies, with Required Action	Fire Tests and Performance-Based Analysis will be performed to evaluate the as installed fire damper configurations. (See Attachment S, Table S-2, Item 14.)	None