

October 27, 2022

Docket Nos.: 50-321
50-366

NL-22-0832
10 CFR 50.90

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

Edwin I. Hatch Nuclear Plant - Units 1 and 2
Supplement to License Amendment Request to Revise Technical Specifications
to Adopt Risk Informed Completion Times TSTF-505, Revision 2,
"Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b"

Ladies and Gentlemen:

On October 26, 2021 [ADAMS Accession Number ML21300A153], 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 Edwin I. Hatch Nuclear Plant (HNP), Units 1 and 2 renewed facility operating licenses (RFOLs) DPR-57 and NPF-5, respectively. The proposed amendment requested U.S. Nuclear Regulatory Commission (NRC) approval to modify Technical Specifications (TS) requirements to permit the use of Risk Informed Completion Times in accordance with TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b" [ML18183A493]. The LAR impacted several TS sections, including TS 3.3.4.1, TS 3.3.4.2, and TS 3.6.1.3.

On December 6, 2021, subsequent to the submittal of the HNP TSTF-505 license amendment request (LAR), SNC submitted a LAR to adopt certain aspects of TSTF-207 [ML21340A255]. On September 2, 2022, the NRC issued Amendments 317 and 262 to the HNP Units 1 and 2 RFOLs, respectively, approving SNC's Hatch TSTF-207 LAR [ML22192A117]. Amendments 317 and 262 include changes to some of the same pages in TS 3.6.1.3 as the HNP TSTF-505 LAR. To account for Amendments 317 and 262, SNC provided a supplement to the HNP TSTF-505 LAR on September 30, 2022 [ML22273A096].

On December 13, 2021, subsequent to the submittal of the HNP TSTF-505 LAR, SNC submitted a LAR to adopt TSTF-227 and TSTF-297 [ML21347A385] (with supplement dated February 1, 2022 [ML22033A073]). It is anticipated that the NRC will issue Amendments 318 and 263 to the HNP Units 1 and 2 RFOLs, respectively, approving the HNP TSTF-227/297 LAR prior to approving the HNP TSTF-505 LAR. Amendments 318 and 263 will include changes to some of the same pages in TS 3.3.4.1 and TS 3.3.4.2 as the HNP TSTF-505 LAR.

The Enclosure to this letter describes the TS markup changes due to Amendments 318 and 263 and assesses their impact on SNC's Hatch TSTF-505 LAR.

The Attachment to this letter updates the impacted TS markups, provided initially in the license amendment request dated October 26, 2021, to include the effects of Amendments 318 and 263. These markups supersede only the TS 3.3.4.1 and TS 3.3.4.2 markups provided in the initial license amendment request dated October 26, 2021.

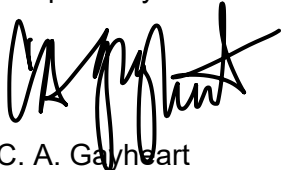
SNC requests the same approval and implementation schedule as requested in its original application [ML21300A153]. The conclusions of the No Significant Hazards Consideration Determination and Environmental Consideration contained in the original application have been reviewed and are unaffected by this supplement.

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

This letter contains no regulatory commitments. If you have any questions, please contact Amy Chamberlain at 205.992.6361.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 27th day of October 2022.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'C. A. Gayheart', is written over the printed name.

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

CAG/agq

Enclosure: Assessment of Amendments 318 and 263 Impact on HNP TSTF-505 License
Amendment Request

Attachment: Revised TSTF-505 Markups Reflecting Amendments 318 and 263

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

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Enclosure to NL-22-0832

Assessment of Amendments 318 and 263 Impact on HNP TSTF-505
License Amendment Request

1.0 INTRODUCTION

On October 26, 2021 [ADAMS Accession Number ML21300A153], Southern Nuclear Operating Company (SNC) requested amendments to Edwin I. Hatch Nuclear Plant (HNP), Units 1 and 2 renewed facility operating licenses (RFOLs) DPR-57 and NPF-5, respectively. The proposed amendment requested U.S. Nuclear Regulatory Commission (NRC) approval to modify Technical Specifications (TS) requirements to permit the use of Risk Informed Completion Times in accordance with TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b" [ML18183A493]. The LAR impacted several TS sections, including TS 3.3.4.1, "EOC-RPT Instrumentation" and TS 3.3.4.2, "ATWS-RPT Instrumentation."

On December 13, 2021, subsequent to the submittal of the HNP TSTF-505 license amendment request (LAR), SNC submitted a LAR to adopt TSTF-227 and TSTF-297 [ML21347A385] (with supplement dated February 1, 2022 [ML22033A073]). It is anticipated that the NRC will issue Amendments 318 and 263 to the HNP Units 1 and 2 RFOLs, respectively, approving the HNP TSTF-227/297 LAR prior to approving the HNP TSTF-505 LAR. Amendments 318 and 263 will include changes to some of the same pages in TS 3.3.4.1 and 3.3.4.2 as the HNP TSTF-505 LAR.

2.0 DESCRIPTION OF CHANGE AND ASSESSMENT OF IMPACT

The issuance of HNP RFOL Amendments 318 and 263 will include issuance of revised TS pages 3.3-28 through 3.3-30, 3.3-32, and 3.3-33 (impacts TS 3.3.4.1 Condition A and Required Action C.1 and TS 3.3.4.2 Required Action D.1). The Hatch TSTF-505 LAR included changes to TS pages 3.3-28 and 3.3-29 (impacts the Completion Time for Required Actions A.1 and A.2), thus there is overlap in the affected pages. Table 1 provides descriptions of the changes and assess the impact Amendments 318 and 263 have on SNC's HNP TSTF-505 LAR.

Table 1: Descriptions of Changes and Assessment of Impact (Sheet 1 of 2)

TS Condition (1)(2)	Amendment 318 and 263 Changes (3)	HNP TSTF-505 LAR Proposed Changes (3)	Assessment of Impact to HNP TSTF-505 LAR
TS 3.3.4.1 Condition A	Revises Condition A as follows: One or more <u>required</u> channels inoperable.	Adds following to the Completion Time for Required Actions A.1 and A.2: <u>OR</u> <u>In accordance with the Risk Informed Completion Time Program</u>	The addition of “required” to Condition A is an administrative clarification. Without the word “required,” one could interpret Condition A as needing entry even if the fuel thermal limits were being applied instead of applying the operability requirements to the End of Cycle Recirculation Pump Trip (EOC-RPT) instrumentation. This change clarifies that the EOC-RPT instrumentation would not be required, and Condition A would not need to be entered, if the Minimum Critical Power Ratio limits are made applicable, as allowed by the Limiting Condition for Operation (LCO). Due to the administrative nature of the Amendments 318 and 263 change, there is no impact to the HNP TSTF-505 LAR application of Risk Informed Completion Time (RICT) to Required Actions A.1 and A.2.
TS 3.3.4.1 Condition C	Revises Required Action C.1 as follows: -----NOTE----- <u>Only applicable if inoperable channel is the result of an inoperable RPT breaker.</u> ----- Remove the associated <u>affected</u> recirculation pump from service.		The Amendments 318 and 263 change adds clarity to TS 3.3.4.1 Required Action C.1. TS 3.3.4.1 already has provisions to remove the associated recirculation pump from service if the trip function is lost. However, the modified wording and note added to the TS provide additional clarity that the Required Action to remove the affected recirculation pump from service is only applicable if the inoperable channel is the result of an inoperable RPT breaker. Due to the administrative nature of the Amendments 318 and 263 change, and the fact that the HNP TSTF-505 LAR does not propose applying RICT to the Completion Time for Required Action C.1, there is no impact to the HNP TSTF-505 LAR application of RICT to Required Actions A.1 and A.2 aside from changes to background text in the TS markups.

Table 1: Descriptions of Changes and Assessment of Impact (Sheet 2 of 2)

TS Condition (1)(2)	Amendment 318 and 263 Changes (3)	HNP TSTF-505 LAR Proposed Changes (3)	Assessment of Impact to HNP TSTF-505 LAR
TS 3.3.4.2 Condition A		Adds following to the Completion Time for Required Actions A.1 and A.2: <u>OR</u> <u>In accordance with the Risk Informed Completion Time Program</u>	Amendments 318 and 263 do not impact TS 3.3.4.2 Condition A or the associated Required Actions and Completion Times. Therefore, there is no impact to the HNP TSTF-505 LAR application of RICT to Required Actions A.1 and A.2.
TS 3.3.4.2 Condition D	Revises Required Action D.1 as follows: -----NOTE----- <u>Only applicable if inoperable channel is the result of an inoperable RPT breaker.</u> ----- Remove the associated affected recirculation pump from service.		The Amendments 318 and 263 change adds clarity to TS 3.3.4.2 Required Action D.1. TS 3.3.4.2 already has provisions to remove the associated recirculation pump from service if the trip function is lost. However, the modified wording and note added to the TS provide additional clarity that the Required Action to remove the affected recirculation pump from service is only applicable if the inoperable channel is the result of an inoperable RPT breaker. Due to the administrative nature of the Amendments 318 and 263 change, and the fact that the HNP TSTF-505 LAR does not propose applying RICT to the Completion Time for Required Action D.1, there is no impact to the HNP TSTF-505 LAR aside from changes to background text in the TS markups.

Notes:

1. Due to formatting of tracked changes, some text rolls to subsequent pages. Therefore, the changes are compared on a TS Condition basis.
2. Conditions listed apply to Unit 1 TS and Unit 2 TS pages.
3. Underline format (e.g., underline) text indicates added text, and strikethrough format (e.g., ~~deleted~~) text indicates deleted text.

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Attachment to NL-22-0832

Revised TSTF-505 Markups Reflecting Amendments 318 and 263

Note:

Blue underline indicates new text proposed in submittal dated October 26, 2021

~~Red strikethrough~~ indicates deleted text proposed in submittal dated October 26, 2021

Green underline indicates new text added by Amendments 318 and 263

~~Grey strikethrough~~ indicates text deleted by Amendments 318 and 263

Attachment consists of 8 pages, excluding this cover page

3.3 INSTRUMENTATION

3.3.4.1 End of Cycle Recirculation Pump Trip (EOC-RPT) Instrumentation

LCO 3.3.4.1 a. Two channels per trip system for each EOC-RPT instrumentation Function listed below shall be OPERABLE:

1. Turbine Stop Valve (TSV) - Closure; and
2. Turbine Control Valve (TCV) Fast Closure, Trip Oil Pressure - Low.

OR

b. LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)," limits for inoperable EOC-RPT as specified in the COLR are made applicable.

APPLICABILITY: THERMAL POWER \geq 27.6% RTP.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more <u>required</u> channels inoperable.	A.1 Restore channel to OPERABLE status.	72 hours
	<u>OR</u>	<u>OR</u> <u>In accordance with the Risk Informed Completion Time Program</u>
		(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	<p>A.2 -----NOTE----- Not applicable if inoperable channel is the result of an inoperable breaker. -----</p> <p>Place channel in trip.</p>	<p>72 hours</p> <p><u>OR</u></p> <p><u>In accordance with the Risk Informed Completion Time Program</u></p>
<p>B. One or more Functions with EOC-RPT trip capability not maintained.</p> <p><u>AND</u></p> <p>MCPR limit for inoperable EOC-RPT not made applicable.</p>	<p>B.1 Restore EOC-RPT trip capability.</p> <p><u>OR</u></p> <p>B.2 Apply the MCPR limit for inoperable EOC-RPT as specified in the COLR.</p>	<p>2 hours</p> <p>2 hours</p>
C. Required Action and associated Completion Time not met.	<p>C.1 -----NOTE----- <u>Only applicable if inoperable channel is the result of an inoperable RPT breaker.</u> -----</p> <p>Remove the associated <u>affected</u> recirculation pump from service.</p> <p><u>OR</u></p> <p>C.2 Reduce THERMAL POWER to < 27.6% RTP.</p>	<p>4 hours</p> <p>4 hours</p>

3.3 INSTRUMENTATION

3.3.4.2 Anticipated Transient Without Scram Recirculation Pump Trip (ATWS-RPT) Instrumentation

LCO 3.3.4.2 Two channels per trip system for each ATWS-RPT instrumentation
Function listed below shall be OPERABLE:

- a. Reactor Vessel Water Level - ATWS-RPT Level; and
- b. Reactor Steam Dome Pressure - High.

APPLICABILITY: MODE 1.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more channels inoperable.	A.1 Restore channel to OPERABLE status.	14 days
	<u>OR</u>	<u>OR</u> <u>In accordance with the Risk Informed Completion Time Program</u> (continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	<p>A.2 -----NOTE----- Not applicable if inoperable channel is the result of an inoperable breaker. -----</p> <p>Place channel in trip.</p>	<p>14 days</p> <p>OR</p> <p>In accordance with the Risk Informed Completion Time Program</p>
B. One Function with ATWS-RPT trip capability not maintained.	B.1 Restore ATWS-RPT trip capability.	72 hours
C. Both Functions with ATWS-RPT trip capability not maintained.	C.1 Restore ATWS-RPT trip capability for one Function.	1 hour
D. Required Action and associated Completion Time not met.	<p>D.1 -----NOTE----- Only applicable if inoperable channel is the result of an inoperable RPT breaker. -----</p> <p>Remove the associated affected recirculation pump from service.</p> <p>OR</p> <p>D.2 Be in MODE 2.</p>	<p>6 hours</p> <p>6 hours</p>

3.3 INSTRUMENTATION

3.3.4.1 End of Cycle Recirculation Pump Trip (EOC-RPT) Instrumentation

- LCO 3.3.4.1
- a. Two channels per trip system for each EOC-RPT instrumentation Function listed below shall be OPERABLE:
 - 1. Turbine Stop Valve (TSV) - Closure; and
 - 2. Turbine Control Valve (TCV) Fast Closure, Trip Oil Pressure - Low.
 - OR
 - b. LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)," limits for inoperable EOC-RPT as specified in the COLR are made applicable.

APPLICABILITY: THERMAL POWER \geq 27.6% RTP.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more <u>required</u> channels inoperable.	A.1 Restore channel to OPERABLE status.	72 hours
	<u>OR</u>	<u>OR</u> <u>In accordance with the Risk Informed Completion Time Program</u>
		(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	<p>A.2 -----NOTE----- Not applicable if inoperable channel is the result of an inoperable breaker. -----</p> <p>Place channel in trip.</p>	<p>72 hours</p> <p><u>OR</u></p> <p><u>In accordance with the Risk Informed Completion Time Program</u></p>
<p>B. One or more Functions with EOC-RPT trip capability not maintained.</p> <p><u>AND</u></p> <p>MCPR limit for inoperable EOC-RPT not made applicable.</p>	<p>B.1 Restore EOC-RPT trip capability.</p> <p><u>OR</u></p> <p>B.2 Apply the MCPR limit for inoperable EOC-RPT as specified in the COLR.</p>	<p>2 hours</p> <p>2 hours</p>
C. Required Action and associated Completion Time not met.	<p>C.1 -----NOTE----- <u>Only applicable if inoperable channel is the result of an inoperable RPT breaker.</u> -----</p> <p>Remove the associated <u>affected</u> recirculation pump from service.</p> <p><u>OR</u></p> <p>C.2 Reduce THERMAL POWER to < 27.6% RTP.</p>	<p>4 hours</p> <p>4 hours</p>

3.3 INSTRUMENTATION

3.3.4.2 Anticipated Transient Without Scram Recirculation Pump Trip (ATWS-RPT) Instrumentation

LCO 3.3.4.2 Two channels per trip system for each ATWS-RPT instrumentation
Function listed below shall be OPERABLE:

- a. Reactor Vessel Water Level - ATWS-RPT Level; and
- b. Reactor Steam Dome Pressure - High.

APPLICABILITY: MODE 1.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more channels inoperable.	A.1 Restore channel to OPERABLE status.	14 days OR In accordance with the Risk Informed Completion Time Program
	OR	(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	<p>A.2 -----NOTE----- Not applicable if inoperable channel is the result of an inoperable breaker. -----</p> <p>Place channel in trip.</p>	<p>14 days</p> <p><u>OR</u></p> <p><u>In accordance with the Risk Informed Completion Time Program</u></p>
B. One Function with ATWS-RPT trip capability not maintained.	B.1 Restore ATWS-RPT trip capability.	72 hours
C. Both Functions with ATWS-RPT trip capability not maintained.	C.1 Restore ATWS-RPT trip capability for one Function.	1 hour
D. Required Action and associated Completion Time not met.	<p>D.1 -----NOTE----- <u>Only applicable if inoperable channel is the result of an inoperable RPT breaker.</u> -----</p> <p>Remove the associated <u>affected</u> recirculation pump from service.</p> <p><u>OR</u></p> <p>D.2 Be in MODE 2.</p>	<p>6 hours</p> <p>6 hours</p>