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November 8, 1999

Ms. Annette Vietti-Cook
Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555-0001

HL-5860

DOCKET NUMBER
PETITION RULE PRM 51-7
(64FR48117)

ATTN: Rulemakings and Adjudications Staff

NEI Petition for Rulemaking to Eliminate Analysis of Severe
Accident Mitigation Alternative from License Renewal Reviews
Docket No. PRM-51-7
(64 Federal Register 48117 dated September 2, 1999)

Dear Ms. Vietti-Cook:

Southern Nuclear Operating Company (SNC) has reviewed the Nuclear Energy Institute (NEI) Petition for Rulemaking to Eliminate Analysis of Severe Accident Mitigation Alternatives (SAMA) from License Renewal Reviews, published in the Federal Register on September 2, 1999. In accordance with the request for comments, SNC is in total agreement with the NEI Petition and the industry comments provide by NEI.

Additionally, SNC has performed the currently required SAMA analysis for E. I. Hatch Nuclear Plant, Units 1 and 2, in preparation of submitting a license renewal application. E. I. Hatch is a two unit, BWR-4 with a Mark I containment. The results indicate that there are no cost beneficial SAMA changes or modifications for E. I. Hatch. SNC assessed 115 potential SAMAs and identified 10 SAMAs for detailed analysis based on screening criteria. The reductions in risk for the SAMAs analyzed were negligible. For the purpose of comparison, monitarily the largest single calculated reduction in risk benefit was \$1,646 with an estimated cost of \$100,000. The SAMA analysis required a significant number of engineering man-hours and represented approximately 50 percent of the cost of preparing the environmental report. The SAMA analysis requirement places an unnecessary economic burden on licensees seeking a renewed license for issues that have been addressed under the current license and should be amended.

Respectfully submitted,

H. L. Sumner, Jr.

HLS/JTD

PDR PRM 51-7

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cc: Southern Nuclear Operating Company
Mr. D. N. Morey, Vice President – Farley
Mr. J. B. Beasley, Jr. , Vice President – Vogtle
NORMS
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