

50-321/366



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

WASHINGTON, D.C. 20555-0001

November 19, 1999

Mr. H. L. Sumner, Jr.  
Vice President - Nuclear  
Hatch Project  
Southern Nuclear Operating  
Company, Inc.  
Post Office Box 1295  
Birmingham, Alabama 35201-1295

**SUBJECT: EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2 RE: COMPLETION OF LICENSING ACTION FOR GENERIC LETTER 98-04, "POTENTIAL FOR DEGRADATION OF THE EMERGENCY CORE COOLING SYSTEM AND THE CONTAINMENT SPRAY SYSTEM AFTER A LOSS-OF-COOLANT ACCIDENT BECAUSE OF CONSTRUCTION AND PROTECTIVE COATING DEFICIENCIES AND FOREIGN MATERIAL IN CONTAINMENT," DATED JULY 14, 1998 (TAC NOS. MA4054 AND MA4055)**

Dear Mr. Sumner:

On July 14, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After a Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment," to all holders of operating licenses or construction permits. The NRC issued GL 98-04 to determine the status of containment coating programs.

In GL 98-04, the NRC staff specifically requested that the licensees provide information outlined below for each of their facilities.

- (1) A summary description of the plant-specific program or programs implemented to ensure that Service Level 1 protective coatings used inside the containment are procured, applied, and maintained in compliance with applicable regulatory requirements and the plant-specific licensing basis for the facility. Include a discussion of how the plant-specific program meets the applicable criteria of 10 CFR Part 50, Appendix B, as well as information regarding any applicable standards, plant-specific procedures or other guidance used for (a) controlling the procurement of coatings and paints used at the facility; (b) the qualification testing of protective coatings; and (c) surface preparation, application, surveillance, and maintenance activities for protective coatings. Maintenance activities refer to rework of degraded coatings, removing degraded coatings to sound coatings, correctly preparing the surfaces, applying new coating, and verifying the quality of coatings.
- (2) Information demonstrating compliance with item (i) or item (ii).
  - (i) For plants with licensing-basis requirements for tracking the amount of unqualified coatings inside the containment and for assessing the impact of potential coating debris on the operation of safety-related systems, structures, and components

**NRC FILE CENTER COPY**

DF01

PDR AD0111

(SSCs) during a postulated design basis loss-of-coolant accident (DB LOCA), the following information shall be provided to demonstrate compliance:

- (a) The date and findings of the last assessment of coatings and the planned date of the next assessment of coatings.
  - (b) The limit for the amount of unqualified protective coatings allowed in the containment and how this limit is determined. Discuss any conservatism in the method used to determine this limit.
  - (c) If a commercial-grade dedication program is being used at your facility for dedicating commercial-grade coatings for Service Level 1 applications inside the containment, discuss how the program adequately qualifies a coating for Service Level 1. Identify what standards or other guidance are currently being used to dedicate containment coatings at your facility.
- (ii) For plants without the above licensing-basis requirements, information shall be provided to demonstrate compliance with the requirements of 10 CFR 50.46b(5), "Long-term cooling" and the functional capability of the safety-related containment spray system (CSS) as set forth in your licensing basis. If a licensee can demonstrate this compliance without quantifying the amount of unqualified coatings, this is acceptable. The following information shall be provided:

If a commercial-grade dedication program is not being used at your facility for qualifying and dedicating commercial-grade coatings for Service Level 1 applications, provide the regulatory and safety basis for not controlling these coatings in accordance with such a program. Additionally, explain why the facility's licensing basis does not require such a program.

In response to GL 98-04, you provided a letter dated October 19, 1998, for Hatch Nuclear Plant, Units 1 and 2. This submittal provided the information requested by GL 98-04. Clarification was provided during a phone call that took place on September 1, 1999. The staff has reviewed your response and has concluded that all requested information has been provided; therefore, we consider GL 98-04 to be closed for your facility. We thank you for your prompt and complete response.

H. L. Sumner, Jr.

- 3 -

If you have any questions regarding this matter, please contact me at 301-415-1419.

Sincerely,

A handwritten signature in black ink, appearing to read "L. L. Olshan". The signature is written in a cursive style with a large, prominent initial "L".

Leonard L. Olshan, Senior Project Manager, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-321 and 50-366

cc: See next page

If you have any questions regarding this matter, please contact me at 301-415-1419.

Sincerely,

Original signed by:

Leonard L. Olshan, Senior Project Manager, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-321 and 50-366

cc: See next page

DISTRIBUTION:

- File Center
- PUBLIC
- PDII-1 R/F
- RPulsifer
- CLauron
- JDavis
- OGC
- ACRS
- PSkinner, RII

DOCUMENT NAME: G:\PDII-1\HATCH\MA4054gl98-04.wpd

INDICATE IN BOX: "C"=COPY W/O ATTACHMENT/ENCLOSURE, "E"=COPY W/ATT/ENCL, "N"=NO COPY

OFFICE	RM:PDII-1	LA:PDII-1 <i>EN</i>	SC: EMCB <i>C</i>	PDII:SC
NAME	<i>LO</i> LOlshan:cn	<i>CH</i> CHawes	<i>ES</i> ESullivan	<i>RE</i> REmch
DATE	11/17/99	11/16/99	11/19/99	11/19/99

OFFICIAL RECORD COPY

Edwin I. Hatch Nuclear Plant

cc:

Mr. Ernest L. Blake, Jr.  
Shaw, Pittman, Potts  
and Trowbridge  
2300 N Street, NW.  
Washington, DC 20037

Mr. D. M. Crowe  
Manager, Licensing  
Southern Nuclear Operating  
Company, Inc.  
P. O. Box 1295  
Birmingham, Alabama 35201-1295

Resident Inspector  
Plant Hatch  
11030 Hatch Parkway N.  
Baxley, Georgia 31531

Mr. Charles H. Badger  
Office of Planning and Budget  
Room 610  
270 Washington Street, SW.  
Atlanta, Georgia 30334

Harold Reheis, Director  
Department of Natural Resources  
205 Butler Street, SE., Suite 1252  
Atlanta, Georgia 30334

Steven M. Jackson  
Senior Engineer - Power Supply  
Municipal Electric Authority  
of Georgia  
1470 Riveredge Parkway, NW  
Atlanta, Georgia 30328-4684

Charles A. Patrizia, Esquire  
Paul, Hastings, Janofsky & Walker  
10th Floor  
1299 Pennsylvania Avenue  
Washington, DC 20004-9500

Chairman  
Appling County Commissioners  
County Courthouse  
Baxley, Georgia 31513

Mr. J. D. Woodard  
Executive Vice President  
Southern Nuclear Operating  
Company, Inc.  
P. O. Box 1295  
Birmingham, Alabama 35201-1295

Mr. P. W. Wells  
General Manager, Edwin I. Hatch  
Nuclear Plant  
Southern Nuclear Operating  
Company, Inc.  
U.S. Highway 1 North  
P. O. Box 2010  
Baxley, Georgia 31515

Mr. R. D. Barker  
Program Manager  
Fossil & Nuclear Operations  
Oglethorpe Power Corporation  
2100 East Exchange Place  
P. O. Box 1349  
Tucker, Georgia 30085-1349