

June 5, 2001

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

SUBJECT: SAFETY EVALUATION OF PROPOSED EMERGENCY PLAN CHANGES FOR  
THE EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2 (TAC NOS. MB0437  
AND MB0438)

Dear Mr. Sumner:

By letter dated June 9, 2000, you submitted proposed changes to the Edwin I. Hatch Nuclear Plant, Units 1 and 2, Emergency Plan. You stated that the emergency plan changes were submitted for NRC staff review and approval as required by 10 CFR Part 50, Appendix E, Section IV.B. On May 8, 2001, you submitted a revision to the original proposal based upon a telephone conference call on April 23, 2001. The May 8, 2001, submittal provided four pages that replaced pages in the June 9, 2000, submittal. In some cases, the replacement pages revert back to the original wording in the Emergency Action Levels prior to the June 9 submittal; in other instances, the replacement pages revise wording in the June 9 submittal. Several changes which were proposed in the June 9, 2000, submittal were left out in the May 8, 2001, submittal and it was acknowledged through discussions that these changes were effectively withdrawn by the May 8, 2001, submittal.

The staff has completed its review of the proposed changes and supporting documentation. Our conclusions regarding the changes in this proposed revision are summarized in the enclosed safety evaluation.

Sincerely,

*/RA/*

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

Docket Nos. 50-321 and 50-416

Enclosure: As stated

cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
ON PROPOSED CHANGES TO EMERGENCY PLAN  
SOUTHERN NUCLEAR OPERATING COMPANY  
EDWIN I HATCH NUCLEAR PLANT, UNITS 1 AND 2  
DOCKET NOS. 50-321 AND 50-366

1.0 INTRODUCTION

By letter dated June 9, 2000, Southern Nuclear Operating Company (the licensee) proposed changes to the Edwin I. Hatch Nuclear Plant, Units 1 and 2, Emergency Plan (EP). The proposed changes involve Emergency Action Levels (EALs) in Section D, "Emergency Classification System," of the EP. The licensee indicated in its June 9, 2000, letter that the changes eliminated redundancy and incorporated NRC-approved changes. The original submittal was revised in a letter from the licensee dated May 8, 2001, following a telephone conference call on April 23, 2001. The May 8, 2001, submittal provided four pages that replaced pages in the June 9, 2000, submittal. In some instances, the replacement pages revert back to the original wording in the EALs prior to the June 9 submittal; in other instances, the replacement pages revise wording in the June 9 submittal. Several changes which were proposed in the June 9, 2000, submittal were left out in the May 8, 2001, submittal and it was acknowledged through discussions with the licensee that these changes were withdrawn by the May 8, 2001, submittal.

2.0 APPLICABLE REGULATIONS AND GUIDANCE

The proposed revisions to the Hatch EP were reviewed against the requirements in 10 CFR 50.47 (b)(4) and Appendix E to 10 CFR Part 50.

Section 50.47(b)(4) specifies that onsite emergency plans must have a "standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, . . ."

Appendix E, Subsection IV.B, specifies that "these emergency action levels shall be discussed and agreed on by the applicant and State and local governmental authorities . . ."

Appendix E, Subsection IV.C, specifies that "emergency action levels (based not only on onsite and offsite radiation monitoring information but also on readings from a number of sensors that indicate a potential emergency, such as pressure in containment and response of the Emergency Core Cooling System) for notification of offsite agencies shall be described. . . ."

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The emergency classes defined shall include: (1) notification of an unusual event, (2) alert, (3) site area emergency, and (4) general emergency."

Regulatory Guide 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," Revision 3, states:

The criteria and recommendations contained in Revision 1 of NUREG-0654/FEMA-REP-1 are considered by the NRC staff to be acceptable methods for complying with the standards in 10 CFR 50.47 that must be met in on-site and off-site emergency response plans.

### 3.0 EVALUATION

Hatch's EAL scheme follows the guidance in NUREG-0654/FEMA-REP-1, "Criteria of Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." NUREG-0654/FEMA-REP-1 was endorsed by the staff in Regulatory Guide 1.101, Revision 3 as an acceptable method for meeting the requirements of 10 CFR 50.47(b)(4) and Appendix E to 10 CFR Part 50.

The licensee proposes to make the following changes for consistency, to eliminate redundancy, and to incorporate NRC-approved changes. The licensee has provided letters of agreement from the State and local authorities.

#### **Revision frequency in Emergency Plan**

The licensee indicated revision frequency is discussed in two different places in the Emergency Plan. The licensee proposes to remove the discussion from Section D since it is already located in Section P. This is an editorial change and does not decrease the effectiveness of the plan and is acceptable.

#### **Change "protected area and the 230 kV and 500kV switchyards" to "operating facility" with an accompanying footnote defining "operating facility"**

The licensee proposes to change this phrase in five places in section D of the Emergency Plan: Table D-1, 7.0, Fire in Plant; Table D-1, 10.2, Explosions; Table D-1, 10.3 Toxic Gas; Table D-1, 10.4 Flammable Gas; and D-2, 9.1, Aircraft Activity. The licensee's justification for this change is that it will make the EALs terminology consistent with other parts of Section D.

The purpose of procedures such as EALs and EOPs is to help the reader make correct decisions and take prompt action. This proposed change would replace clear concise words (specific locations) with vague language. The staff finds that the proposed change is a decrease in effectiveness and is not acceptable. As the result of the April 23, 2001, conference call, this change was withdrawn in the licensee's May 8, 2001, letter.

#### **Section D, Table D-1, 9.2. High Winds**

The licensee originally proposed to reword the EAL for the notice of unusual event (NOUE) initiating condition for high winds and tornadoes to read as follows:

Any tornado observed on site

OR

Any hurricane force winds projected on site

In the April 23, 2001, conference call the licensee was advised that the reference was incorrect and that the proposed wording was vague and contrary to the purpose of NUMARC/NESP-007 guidance. In the May 8, 2001, submittal, this EAL was modified to add ">75 mph," after "any hurricane force winds projected on site." This change is acceptable.

#### **Loss of control room indications/alarms/annunciators**

The licensee proposes to delete the phrase "all meteorological instrumentation" in the EAL addressing loss of control room indication, alarms, and annunciators. The licensee's justification is that NRC had shifted the emphasis from classification based upon dose assessment to classification based upon plant conditions and that this change was endorsed by the NRC staff in EPPOS 1, "Emergency Preparedness Position" (EPPOS) on acceptable deviations from Appendix 1 of NUREG-0654 based upon the staff's regulatory analysis of NUMARC/NESP-007, "Methodology for Development of Emergency Action Levels." The staff agrees that this deletion is acceptable.

#### **Contaminated injured victim**

The licensee proposes to delete the EAL addressing a contaminated injured victim. The licensee's justification is that this event does not meet the threshold of the NOUE emergency class and is not a precursor to a more serious event. In addition, this event is reportable in accordance with 10 CFR 50.72 as a non-emergency. This issue was specifically addressed by the staff in EPPOS 1. Therefore, the staff agrees with this justification and the deletion acceptable.

#### **Multiple symptoms and other conditions**

The first part of this proposed change in this EAL is editorial, correcting a reference to the Technical Specification safety limits. The licensee also creates a separate section to address other conditions warranting increased attention of the plant operations staff or State and/or local authorities. The staff finds these changes acceptable.

#### **High winds**

The licensee proposes to reorder the conditions related to high winds by listing the tornado first and high winds second. This is an editorial change, and the staff finds it to be acceptable.

#### 4.0 CONCLUSION

The EAL scheme in the licensee's emergency plan is based upon NUREG-0654. In this revision, the licensee is attempting to selectively incorporate some aspects of the NUMARC/NESP-007 scheme while continuing to use a NUREG-0654 scheme. Regulatory Guide 1.101, Revision 3 recommends not mixing the emergency classification guidance in NUMARC/NESP-007 with that of Appendix 1 to NUREG-0654. However, EPPOS 1 permits some deviations where sufficient bases are provided. The proposed changes are a mix of administrative and technical issues. They do not decrease the effectiveness of the Plan, and the staff finds these changes to be acceptable.

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Date: June 5, 2001

Edwin I. Hatch Nuclear Plant

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