



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 29, 2014

Mr. C. R. Pierce
Regulatory Affairs Director
Southern Nuclear Operating Company, Inc.
Post Office Box 1295, Bin - 038
Birmingham, AL 35201-1295

SUBJECT: EDWIN I. HATCH NUCLEAR PLANT, UNIT NOS. 1 AND 2, ISSUANCE OF
AMENDMENTS REGARDING CONTROL ROOM HABITABILITY (TAC NOS.
MF2513 AND MF2514)

Dear Mr. Pierce:

The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment No. 268 to Renewed Facility Operating License DPR-57 and Amendment No. 212 to Renewed Facility Operating License NPF-5 for the Edwin I. Hatch Nuclear Plant, Unit Nos. 1 and 2, respectively. The amendments revise the Technical Specifications (TSs) in response to your application dated July 23, 2013 and August 5, 2014.

These amendments revise the TS action and surveillance requirements in Specification 3.7.4, "Main Control Room Environmental Control (MCREC) System," and add a new administrative controls program, Specification 5.5.14, "Control Room Envelope Habitability Program." The purpose of the changes is to ensure that control room envelope (CRE) boundary operability is maintained and verified through effective surveillance and programmatic requirements, and that appropriate remedial actions are taken in the event of an inoperable CRE boundary.

A copy of the related Safety Evaluation is also enclosed. A Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Martin", is positioned above the typed name.

Robert Martin, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-321 and 50-366

Enclosures:

1. Amendment No. 268 to DPR-57
2. Amendment No. 212 to NPF-5
3. Safety Evaluation

cc w/encls: Distribution via Listserv



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SOUTHERN NUCLEAR OPERATING COMPANY, INC.

GEORGIA POWER COMPANY

OGLETHORPE POWER CORPORATION

MUNICIPAL ELECTRIC AUTHORITY OF GEORGIA

CITY OF DALTON, GEORGIA

DOCKET NO. 50-321

EDWIN I. HATCH NUCLEAR PLANT, UNIT NO. 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 268
Renewed License No. DPR-57

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment to the Edwin I. Hatch Nuclear Plant, Unit No. 1 (the facility) Renewed Facility Operating License No. DPR-57 filed by Southern Nuclear Operating Company, Inc. (the licensee), acting for itself, Georgia Power Company, Oglethorpe Power Corporation, Municipal Electric Authority of Georgia, and City of Dalton, Georgia (the owners), dated July 23, 2013 and August 5, 2014, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations as set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

Enclosure 1

2. Accordingly, the license is hereby amended by page changes to the Technical Specifications, as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. DPR-57 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 268, are hereby incorporated in the license. Southern Nuclear shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 180 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert Pascarelli, Chief
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to Renewed Facility
Operating License No. DPR-57
and the Technical Specifications

Date of Issuance: August 29, 2014

ATTACHMENT TO
LICENSE AMENDMENT NO. 268
RENEWED FACILITY OPERATING LICENSE NO. DPR-57
DOCKET NO. 50-321

Replace the following pages of the License and the Appendix A Technical Specifications (TSs) with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove Pages

License

DPR 57, Page 4
DPR 57, Page 7

TSs

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3.7-8
3.7-9
3.7-10
3.7-11
5.0-17
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Insert Pages

License

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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 2804 megawatts thermal.

(2) Technical Specifications

The Technical Specifications (Appendix A) and the Environmental Protection Plan (Appendix B), as revised through Amendment No. 268 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 shall implement and maintain in effect all provisions of the fire protection program, which is referenced in the Updated Final Safety Analysis Report for the facility, as contained in the updated Fire Hazards Analysis and Fire Protection Program for the Edwin I. Hatch Nuclear Plant, Units 1 and 2, which was originally submitted by letter dated July 22, 1986. Southern Nuclear may make changes to the fire protection program without prior Commission approval only if the changes

that will be located in a seismically qualified manual transfer switch housing. The aforementioned circuit breaker and fuses shall be adequately coordinated with the upstream load center breaker over the entire range. These devices shall be adequately rated to prevent adverse effects of a fault to the rest of the distribution system.

- 2) SNC shall implement modifications by May 31, 2010, as described in Enclosure 1, section 2.7.3.2, of the LAR and section 5.7 of SNC's letter dated February 25, 2008 (NL 08-0175) to modify the design for the air supply to the turbine building exhaust ventilation dampers, such that operating air to the dampers will be supplied from a non-interruptible instrument air source to eliminate single failure point vulnerability to loss of system/instrument air.
- 3) SNC shall complete actions by May 31, 2010, as described in SNC's letter dated February 25, 2008 (NL-08-0175) to install and implement the capability for Standby Liquid Control System hand switch jumpers for HNP Units 1 and 2.
- 4) SNC shall complete actions by May 31, 2012 for HNP Unit 1, as described in SNC's letters dated February 25, 2008 (NL-08-0175) and July 2, 2008 (NL-08-1022), to modify the following Main Steam Isolation Valve alternate leakage treatment boundary valves, such that they can be closed in the event of a loss of offsite power without requiring local operation:

1N38-F101A, 1N38-F101B, 1N33-F012, 1N33-F013

- 5) SNC shall implement actions by May 31, 2010, as described in SNC's letter dated February 27, 2008, to assure that temperature switches which monitor charcoal bed temperature meet the environmental qualification requirements of 10 CFR 50.49.

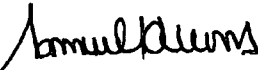
(10) TSTF-448, Control Room Habitability

Upon implementation of the Amendments adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.4.4, in accordance with TS 5.5.14.c.(i), the assessment of CRE habitability as required by Specification 5.5.14.c.(ii), and the measurement of CRE pressure as required by Specification 5.5.14.d, shall be considered met. Following implementation:

- a. The first performance of SR 3.7.4.4, in accordance with Specification 5.5.14.c.(i), shall be within the next 18 months.
- b. The first performance of the periodic assessment of CRE habitability, Specification 5.5.14.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, of the next successful tracer gas test.

- c. The first performance of the periodic measurement of CRE pressure, Specification 5.5.14.d, shall be within 24 months, plus the 6 months allowed by SR 3.0.2, from the date of the most recent successful pressure measurement test.
- D. Southern Nuclear shall not market or broker power or energy from Edwin I. Hatch Nuclear Plant, Unit 1.
- 3. This renewed license is effective as of the date of issuance and shall expire at midnight, August 6, 2034.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION



Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

Attachments:

Appendix A – Technical Specifications

Appendix B – Environmental Protection Plan

Date of Issuance: January 15, 2002

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3.7 PLANT SYSTEMS

3.7.4 Main Control Room Environmental Control (MCREC) System

LCO 3.7.4 Two MCREC subsystems shall be OPERABLE.

-----NOTE-----

The main control room envelope (CRE) boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, and 3,
During movement of irradiated fuel assemblies in the secondary containment,
During CORE ALTERATIONS,
During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One MCREC subsystem inoperable for reasons other than Condition B.	A.1 Restore MCREC subsystem to OPERABLE status.	7 days
B. One or more MCREC subsystems inoperable due to inoperable CRE boundary in MODE 1, 2, or 3.	B.1 Initiate action to implement mitigating actions.	Immediately
	<u>AND</u>	
	B.2 Verify mitigating actions ensure CRE occupant exposures to radiological, chemical, and smoke hazards will not exceed limits.	24 hours
	<u>AND</u>	
	B.3 Restore CRE boundary to OPERABLE status.	90 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3.	C.1 Be in MODE 3.	12 hours
	<u>AND</u> C.2 Be in MODE 4.	36 hours
D. Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.	-----NOTE----- LCO 3.0.3 is not applicable. -----	
	D.1 Place OPERABLE MCREC subsystem in pressurization mode.	Immediately
	<u>OR</u>	
	D.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment.	Immediately
	<u>AND</u> D.2.2 Suspend CORE ALTERATIONS.	Immediately
E. Two MCREC subsystems inoperable in MODE 1, 2, or 3 for reasons other than Condition B.	<u>AND</u> D.2.3 Initiate action to suspend OPDRVs.	Immediately
	E.1 Enter LCO 3.0.3.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>F. Two MCREC subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p> <p><u>OR</u></p> <p>One or more MCREC subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p>	
	<p>F.1 Suspend movement of irradiated fuel assemblies in the secondary containment.</p>	Immediately
	<p><u>AND</u></p>	
	<p>F.2 Suspend CORE ALTERATIONS.</p>	Immediately
	<p><u>AND</u></p>	
	<p>F.3 Initiate action to suspend OPDRVs.</p>	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.4.1	Operate each MCREC subsystem \geq 15 minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.7.4.2	Perform required MCREC filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.4.3	Verify each MCREC subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.7.4.4	Perform required CRE unfiltered air inleakage testing in accordance with the Control Room Envelope Habitability Program.	In accordance with the Control Room Envelope Habitability Program

5.5 Programs and Manuals

5.5.12 Primary Containment Leakage Rate Testing Program (continued)

The provisions of SR 3.0.3 are applicable to the Primary Containment Leakage Rate Testing Program.

5.5.13 Surveillance Frequency Control Program

This program provides controls for the Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operations are met.

- a. The Surveillance Frequency Control Program shall control a list of Frequencies of those Surveillance Requirements for which the Frequency is controlled by the program.
- b. Changes to the Frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with the NEI 04-10 "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.
- c. The provisions of Surveillance Requirements 3.0.2 and 3.0.3 are applicable to the Frequencies established in the Surveillance Frequency Control Program.

5.5.14 Control Room Envelope Habitability Program

A Control Room Envelope (CRE) Habitability Program shall be established and implemented to ensure that CRE habitability is maintained such that, with an OPERABLE Main Control Room Environmental Control (MCREC) System, CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under design basis accident (DBA) conditions without personnel receiving radiation exposures in excess of 5 rem total effective dose equivalent (TEDE) for the duration of the accident. The program shall include the following elements:

- a. The definition of the CRE and the CRE boundary.
- b. Requirements for maintaining the CRE boundary in its design condition including configuration control and preventive maintenance.
- c. Requirements for (i) determining the unfiltered air inleakage past the CRE boundary into the CRE in accordance with the testing methods and at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003, and (ii) assessing CRE habitability at the

(continued)

5.5 Programs and Manuals

5.5.14 Control Room Envelope Habitability Program (continued)

Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0.

- d. Measurement, at designated locations, of the CRE pressure relative to all external areas adjacent to the CRE boundary during the pressurization mode of operation by one subsystem of the MCREC System, operating at the flow rate required by the VFTP, at a Frequency of 24 months on a STAGGERED TEST BASIS. The results shall be trended and used as part of the 24 month assessment of the CRE boundary.
 - e. The quantitative limits on unfiltered air inleakage into the CRE. These limits shall be stated in a manner to allow direct comparison to the unfiltered air inleakage measured by the testing described in paragraph c. The unfiltered air inleakage limit for radiological challenges is the inleakage flow rate assumed in the licensing basis analyses of DBA consequences. Unfiltered air inleakage limits for hazardous chemicals must ensure that exposure of CRE occupants to these hazards will be within the assumptions in the licensing basis.
 - f. The provisions of SR 3.0.2 are applicable to the Frequencies for assessing CRE habitability, determining CRE unfiltered inleakage, and measuring CRE pressure and assessing the CRE boundary as required by paragraphs c and d, respectively.
-

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Deleted.

5.6.2 Annual Radiological Environmental Operating Report

-----NOTE-----
A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the

(continued)

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and the Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

5.6.4 Deleted.

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
- 1) The Average Planar Linear Heat Generation Rate for Specification 3.2.1.
 - 2) The Minimum Critical Power Ratio for Specification 3.2.2.
 - 3) The Linear Heat Generation Rate for Specification 3.2.3.

(continued)

5.6 Reporting Requirements

5.6.5 CORE OPERATING LIMITS REPORT (COLR) (continued)

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in NEDE-24011-P-A, "General Electric Standard Application for Reactor Fuel," (applicable amendment specified in the COLR).
- c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any mid-cycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

5.6.6 Post Accident Monitoring (PAM) Instrumentation Report

When a report is required by LCO 3.3.3.1, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.0 ADMINISTRATIVE CONTROLS

5.7 High Radiation Area

- 5.7.1 Pursuant to 10 CFR 20, paragraph 20.1601, in lieu of the requirements of 10 CFR 20.1601a, each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation is > 100 mrem/hr but < 1000 mrem/hr, measured at 30 cm from the radiation source or from any surface the radiation penetrates, shall be barricaded and conspicuously posted as a high radiation area. Entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., Health Physics Technicians) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates < 1000 mrem/hr, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas.

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device that continuously indicates the radiation dose rate in the area.
 - b. A radiation monitoring device that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel are aware of them.
 - c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physics supervision in the RWP.
- 5.7.2 In addition to the requirements of Specification 5.7.1, areas with radiation levels ≥ 1000 mrem/hr, measured at 30 cm from the radiation source or from any surface the radiation penetrates, but less than 500 Rads in 1 hour measured at 1 meter from the radiation source or from any surface that the radiation penetrates, shall be provided with locked or continuously guarded doors to prevent unauthorized entry and the keys shall be maintained under the administrative control of the Shift Supervision on duty or Health Physics supervision.
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SOUTHERN NUCLEAR OPERATING COMPANY, INC.

GEORGIA POWER COMPANY

OGLETHORPE POWER CORPORATION

MUNICIPAL ELECTRIC AUTHORITY OF GEORGIA

CITY OF DALTON, GEORGIA

DOCKET NO. 50-366

EDWIN I. HATCH NUCLEAR PLANT, UNIT NO. 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 212
Renewed License No. NPF-5

1. **The Nuclear Regulatory Commission (the Commission)** has found that:
 - A. The application for amendment to the Edwin I. Hatch Nuclear Plant, Unit No. 2 (the facility) Renewed Facility Operating License No. NPF-5 filed by Southern Nuclear Operating Company, Inc. (the licensee), acting for itself, Georgia Power Company, Oglethorpe Power Corporation, Municipal Electric Authority of Georgia, and City of Dalton, Georgia (the owners), dated July 23, 2013, and August 5, 2014, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations as set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

Enclosure 2

2. Accordingly, the license is hereby amended by page changes to the Technical Specifications, as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-5 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 212 are hereby incorporated in the license. Southern Nuclear shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 180 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert Pascarelli, Chief
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to Renewed Facility
Operating License No. NPF-5
and the Technical Specifications

Date of Issuance: August 29, 2014

ATTACHMENT TO
LICENSE AMENDMENT NO. 212
RENEWED FACILITY OPERATING LICENSE NO. NPF-5
DOCKET NO. 50-366

Replace the following pages of the License and the Appendix A Technical Specifications (TSs) with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove Pages

License

NPF-5, Page 4
NPF-5, Page 6a

TSs

v
3.7-8
3.7-9
3.7-10
3.7-11
5.0-17
5.0-18
5.0-19
5.0-20
5.0-21
5.0-22

Insert Pages

License

NPF-5, Page 4
NPF-5, Page 6a
NPF-5, Page 6b

TSs

v
3.7-8
3.7-9
3.7-10
3.7-11
5.0-17
5.0-18
5.0-19
5.0-20
5.0-21
5.0-22

- (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. 212 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 shall implement and maintain in effect all provisions of the fire protection program, which is referenced in the Updated Final Safety Analysis Report for the facility, as contained

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

manually switched over from normally operating power supplies, to a Class - 1E circuit that will be isolated by an appropriately rated safety related, environmentally and seismically qualified circuit breaker. For further protection and isolation, the licensee shall also use fuses that will be located in a seismically qualified manual transfer switch housing. The aforementioned circuit breaker and fuses shall be adequately coordinated with the upstream load center breaker over the entire range. These devices shall be adequately rated to prevent adverse effects of a fault to the rest of the distribution system.

- ii) SNC shall implement modifications by May 31, 2010, as described in Enclosure 1, section 2.7.3.2, of the LAR and section 5.7 of SNC's letter dated February 25, 2008, (NL 08-0175) to modify the design for the air supply to the turbine building exhaust ventilation dampers, such that operating air to the dampers will be supplied from a non-interruptible instrument air source to eliminate single failure point vulnerability to loss of system/instrument air.
- iii) SNC shall complete actions by May 31, 2010, as described in SNC's letter dated February 25, 2008 (NL-08-0175) to install and implement the capability for Standby Liquid Control System hand switch jumpers for HNP Units 1 and 2.
- iv) SNC shall complete actions by May 31, 2011, for HNP Unit 2, as described in SNC's letters dated February 25, 2008 (NL-08-0175) and July 2, 2008 (NL-08-1022), to modify the following Main Steam Isolation Valve alternate leakage treatment boundary valves, such that they can be closed in the event of a loss of offsite power without requiring local operation:

2N11-F004A, 2N11-F004B, 2N33-F003, 2N33-F004
- v) SNC shall implement actions by May 31, 2010, as described in SNC's letter dated February 27, 2008, to assure that temperature switches which monitor charcoal bed temperature meet the environmental qualification requirements of 10 CFR 50.49.

(h) TSTF-448, Control Room Habitability

Upon implementation of the Amendments adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air leakage as required by SR 3.7.4.4, in accordance with TS 5.5.14.c.(i), the assessment of CRE habitability as required by Specification 5.5.14.c.(ii), and the measurement of CRE pressure as required by Specification 5.5.14.d, shall be considered met. Following implementation:

- i) The first performance of SR 3.7.4.4, in accordance with Specification 5.5.14.c.(i), shall be within the next 18 months.
- ii) The first performance of the periodic assessment of CRE habitability, Specification 5.5.14.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, of the next successful tracer gas test.
- iii) The first performance of the periodic measurement of CRE pressure, Specification 5.5.14.d, shall be within 24 months, plus the 6 months allowed by SR 3.0.2, from the date of the most recent successful pressure measurement test.

D. This renewed license is subject to the following antitrust conditions:

(1) As used herein:

- (a) "Entity" means any financially responsible person, private or public corporation, municipality, county, cooperative, association, joint stock association or business trust, owning, operating or proposing to own or operate equipment or facilities within the state of Georgia (other than Chatham, Effingham, Fannin, Towns and Union Counties) for

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3.7 PLANT SYSTEMS

3.7.4 Main Control Room Environmental Control (MCREC) System

LCO 3.7.4 Two MCREC subsystems shall be OPERABLE.

NOTE

The main control room envelope (CRE) boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, and 3,
During movement of irradiated fuel assemblies in the secondary containment,
During CORE ALTERATIONS,
During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One MCREC subsystem inoperable for reasons other than Condition B.	A.1 Restore MCREC subsystem to OPERABLE status.	7 days
B. One or more MCREC subsystems inoperable due to inoperable CRE boundary in MODE 1, 2, or 3.	B.1 Initiate action to implement mitigating actions.	Immediately
	<u>AND</u> B.2 Verify mitigating actions ensure CRE occupant exposures to radiological, chemical, and smoke hazards will not exceed limits.	24 hours
	<u>AND</u> B.3 Restore CRE boundary to OPERABLE status.	90 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3.	C.1 Be in MODE 3.	12 hours
	<u>AND</u> C.2 Be in MODE 4.	36 hours
D. Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.	-----NOTE----- LCO 3.0.3 is not applicable. -----	
	D.1 Place OPERABLE MCREC subsystem in pressurization mode.	Immediately
	<u>OR</u>	
	D.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment.	Immediately
	<u>AND</u> D.2.2 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u> D.2.3 Initiate action to suspend OPDRVs.	Immediately
E. Two MCREC subsystems inoperable in MODE 1, 2, or 3 for reasons other than Condition B.	E.1 Enter LCO 3.0.3.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>F. Two MCREC subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p> <p><u>OR</u></p> <p>One or more MCREC subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p>	
	<p>F.1 Suspend movement of irradiated fuel assemblies in the secondary containment.</p>	Immediately
	<p><u>AND</u></p> <p>F.2 Suspend CORE ALTERATIONS.</p>	Immediately
	<p><u>AND</u></p> <p>F.3 Initiate action to suspend OPDRVs.</p>	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.4.1	Operate each MCREC subsystem \geq 15 minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.7.4.2	Perform required MCREC filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.4.3	Verify each MCREC subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.7.4.4	Perform required CRE unfiltered air inleakage testing in accordance with the Control Room Envelope Habitability Program.	In accordance with the Control Room Envelope Habitability Program

5.5 Programs and Manuals

5.5.12 Primary Containment Leakage Rate Testing Program (continued)

The provisions of SR 3.0.3 are applicable to the Primary Containment Leakage Rate Testing Program.

5.5.13 Surveillance Frequency Control Program

This program provides controls for the Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operation are met.

- a. The Surveillance Frequency Control Program shall contain a list of Frequencies of those Surveillance Requirements for which the Frequency is controlled by the program.
- b. Changes to the Frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with the NEI 04-10 "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.
- c. The provisions of Surveillance Requirements 3.0.2 and 3.0.3 are applicable to the Frequencies established in the Surveillance Frequency Control Program.

5.5.14 Control Room Envelope Habitability Program

A Control Room Envelope (CRE) Habitability Program shall be established and implemented to ensure that CRE habitability is maintained such that, with an OPERABLE Main Control Room Environmental Control (MCREC) System, CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under design basis accident (DBA) conditions without personnel receiving radiation exposures in excess of 5 rem total effective dose equivalent (TEDE) for the duration of the accident. The program shall include the following elements:

- a. The definition of the CRE and the CRE boundary.
- b. Requirements for maintaining the CRE boundary in its design condition including configuration control and preventive maintenance.
- c. Requirements for (i) determining the unfiltered air inleakage past the CRE boundary into the CRE in accordance with the testing methods and at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003, and (ii) assessing CRE habitability at the

(continued)

5.5 Programs and Manuals

5.5.14 Control Room Envelope Habitability Program (continued)

Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0.

- d. Measurement, at designated locations, of the CRE pressure relative to all external areas adjacent to the CRE boundary during the pressurization mode of operation by one subsystem of the MCREC System, operating at the flow rate required by the VFTP, at a Frequency of 24 months on a STAGGERED TEST BASIS. The results shall be trended and used as part of the 24 month assessment of the CRE boundary.
 - e. The quantitative limits on unfiltered air inleakage into the CRE. These limits shall be stated in a manner to allow direct comparison to the unfiltered air inleakage measured by the testing described in paragraph c. The unfiltered air inleakage limit for radiological challenges is the inleakage flow rate assumed in the licensing basis analyses of DBA consequences. Unfiltered air inleakage limits for hazardous chemicals must ensure that exposure of CRE occupants to these hazards will be within the assumptions in the licensing basis.
 - f. The provisions of SR 3.0.2 are applicable to the Frequencies for assessing CRE habitability, determining CRE unfiltered inleakage, and measuring CRE pressure and assessing the CRE boundary as required by paragraphs c and d, respectively.
-

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Deleted.

5.6.2 Annual Radiological Environmental Operating Report

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the

(continued)

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and the Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

5.6.4 Deleted.

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
 - 1) The Average Planar Linear Heat Generation Rate for Specification 3.2.1.
 - 2) The Minimum Critical Power Ratio for Specification 3.2.2.
 - 3) The Linear Heat Generation Rate for Specification 3.2.3.

(continued)

5.6 Reporting Requirements

5.6.5 CORE OPERATING LIMITS REPORT (COLR) (continued)

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in NEDE-24011-P-A, "General Electric Standard Application for Reactor Fuel," (applicable amendment specified in the COLR).
- c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any mid-cycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

5.6.6 Post Accident Monitoring (PAM) Instrumentation Report

When a report is required by LCO 3.3.3.1, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.0 ADMINISTRATIVE CONTROLS

5.7 High Radiation Area

- 5.7.1 Pursuant to 10 CFR 20, paragraph 20.1601, in lieu of the requirements of 10 CFR 20.1601a, each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation is > 100 mrem/hr but < 1000 mrem/hr, measured at 30 cm from the radiation source or from any surface the radiation penetrates, shall be barricaded and conspicuously posted as a high radiation area. Entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., Health Physics Technicians) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates < 1000 mrem/hr, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas.

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device that continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel are aware of them.
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physics supervision in the RWP.

- 5.7.2 In addition to the requirements of Specification 5.7.1, areas with radiation levels ≥ 1000 mrem/hr, measured at 30 cm from the radiation source or from any surface the radiation penetrates, but less than 500 Rads in 1 hour measured at 1 meter from the radiation source or from any surface that the radiation penetrates, shall be provided with locked or continuously guarded doors to prevent unauthorized entry and the keys shall be maintained under the administrative control of the Shift Supervision on duty or Health Physics supervision.
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO

AMENDMENT NO. 268 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-57

AND

AMENDMENT NO. 212 TO RENEWED FACILITY OPERATING LICENSE NO. NPF-5

SOUTHERN NUCLEAR OPERATING COMPANY, INC.

EDWIN I. HATCH NUCLEAR PLANT, UNIT NOS. 1 AND 2

DOCKET NOS. 50-321 AND 50-366

1.0. INTRODUCTION

By license amendment request (LAR) dated July 23, 2013, and August 5, 2014, (Agencywide Documents Access and Management System (ADAMS), Accession Nos. ML13205A160 and ML14217A516, Southern Nuclear Operating Company, Inc. (SNC, the licensee), requested changes to the Technical Specification (TS) Surveillance Requirements (SR) for the Edwin I. Hatch Nuclear Plant, Unit Nos. 1 and 2 (HNP). The LAR would revise the TS to utilize the Consolidated Line Item Improvement Process (CLIIP) for Technical Specification Task Force (TSTF) 448, Rev. 3 regarding control room envelope habitability.

On August 8, 2006, the commercial nuclear electrical power generation industry owners group, TSTF submitted a proposed change, TSTF-448, Revision 3, to the improved standard technical specifications (STS) (NUREGs 1430-1434) on behalf of the industry (TSTF-448, Revisions 0, 1, and 2 were prior draft iterations). TSTF-448, Revision 3, is a proposal to establish more effective and appropriate action, surveillance, and administrative STS requirements related to ensuring the habitability of the control room envelope (CRE).

In NRC Generic Letter 2003-01 (Reference 1), licensees were alerted to findings at facilities that existing TS surveillance requirements for the Control Room Envelope Emergency Ventilation System (CREEVS) may not be adequate. Specifically, the results of ASTM E741 (Reference 2) tracer gas tests to measure CRE unfiltered inleakage at facilities indicated that the differential pressure surveillance is not a reliable method for demonstrating CRE boundary operability. Licensees were requested to address existing TS as follows:

Provide confirmation that your technical specifications verify the integrity [i.e., operability] of the CRE [boundary], and the assumed [unfiltered] leakage rates of potentially contaminated air. If you currently have a differential pressure surveillance requirement to demonstrate CRE [boundary] integrity, provide the basis for your conclusion that it remains adequate to demonstrate CRE integrity in light of the ASTM E741 testing results. If you conclude that your differential pressure surveillance requirement is no longer adequate, provide a schedule for: 1) revising the surveillance requirement in your technical specification to reference an acceptable surveillance methodology (e.g., ASTM E741), and 2) making any necessary modifications to your CRE boundary so that compliance with your new surveillance requirement can be demonstrated.

If your facility does not currently have a technical specification surveillance requirement for your CRE integrity, explain how and at what frequency you confirm your CRE integrity and why this is adequate to demonstrate CRE integrity.

To promote standardization and to minimize the resources that would be needed to create and process plant-specific amendment applications in response to the concerns described in the generic letter, the industry and the NRC proposed revisions to CRE habitability system requirements contained in the STS, using the STS change traveler process. This effort culminated in Revision 3 to traveler TSTF-448, "Control Room Habitability," which the NRC staff approved on January 17, 2007.

Consistent with the traveler as incorporated into NUREG-1433, the licensee proposed revising action and surveillance requirements in Specification 3.7.4, "Main Control Room Environmental Control (MCREC) System," and adding a new administrative controls program, Specification 5.5.14, "Control Room Envelope Habitability Program." The purpose of the changes is to ensure that CRE boundary operability is maintained and verified through effective surveillance and programmatic requirements, and that appropriate remedial actions are taken in the event of an inoperable CRE boundary.

Some editorial and plant-specific changes were incorporated into this safety evaluation resulting in minor deviations from the model safety evaluation text in TSTF-448, Revision 3.

The supplement dated August 5, 2014, provided additional information that clarified the application, did not expand the scope of the application as originally noticed and did not change the staff's original proposed no significant hazards consideration determination.

2.0 REGULATORY EVALUATION

2.1 Control Room and Control Room Envelope

NRC Regulatory Guide 1.196, "Control Room Habitability at Light-Water Nuclear Power Reactors," Revision 0, May 2003, (Reference 4) uses the term "control room envelope" in addition to the term "control room" and defines each term as follows:

Control Room: The plant area, defined in the facility licensing basis, in which actions can be taken to operate the plant safely under normal conditions and to maintain the reactor in a safe condition during accident situations. It encompasses the instrumentation and

controls necessary for a safe shutdown of the plant and typically includes the critical document reference file, computer room (if used as an integral part of the emergency response plan), shift supervisor's office, operator wash room and kitchen, and other critical areas to which frequent personnel access or continuous occupancy may be necessary in the event of an accident.

Control Room Envelope: The plant area, defined in the facility licensing basis that in the event of an emergency, can be isolated from the plant areas and the environment external to the CRE. This area is served by an emergency ventilation system, with the intent of maintaining the habitability of the control room. This area encompasses the control room, and may encompass other non-critical areas to which frequent personnel access or continuous occupancy is not necessary in the event of an accident.

NRC Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003 (Reference 5), also contains these definitions, but uses the term CRE to mean both. This is because the protected environment provided for operators varies with the nuclear power facility. At some facilities this environment is limited to the control room; at others, it is the CRE. In this safety evaluation, consistent with the proposed changes to the STS, the CRE will be used to designate both. For consistency, facilities should use the term CRE with an appropriate facility-specific definition derived from the above CRE definition.

2.2 Main Control Room Environmental Control (MCREC) System

The MCREC System provides a protected environment from which operators can control the unit, during airborne challenges from radioactivity, hazardous chemicals, and smoke, during both normal and accident conditions.

The MCREC System is designed to maintain a habitable environment in the control room envelope for 30 days of continuous occupancy after a Design Basis Accident (DBA) without exceeding a 5 rem Total Effective Dose Equivalent (TEDE).

The MCREC System is shared between the two units at the HNP.

The MCREC System consists of two redundant subsystems, each capable of maintaining the habitability of the CRE. The MCREC System is considered operable when the individual components necessary to limit operator exposure are operable in both subsystems. A MCREC subsystem is considered operable when the associated:

- Filter booster fans are operable;
- High efficiency particulate air (HEPA) filters and charcoal adsorbers are not excessively restricting flow, and are capable of performing their filtration functions;
- Ductwork, valves, and dampers are operable, and air circulation can be maintained;
- One Air Handling Unit (AHU) fan is operable, and either operating or having its control switch in "Standby" with operable automatic start capability;

- AHU cooling coils, water cooled condensing units, refrigerant compressors, and associated instrumentation and controls to ensure loop seal is maintained;
- CRE boundary is operable (the single boundary supports both subsystems).

The CRE boundary is considered operable when the measured unfiltered air inleakage is less than or equal to the inleakage value assumed by the licensing basis analyses of DBA consequences to CRE occupants.

2.3 Regulations Applicable to Control Room Habitability

In Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," General Design Criteria (GDC) 1, 2, 3, 4, 5, and 19 apply to CRE habitability.

HNP, Unit 1, was not licensed to the 10 CFR 50, Appendix A, GDC. Unit 1 was licensed to pre-GDC equivalents. HNP, Unit 2, was licensed under the 10 CFR 50, Appendix A GDC. The HNP main control room habitability systems are shared by Unit 1 and Unit 2, and are designed to meet 10 CFR 50, Appendix A GDC 19.

Generic Letter 2003-01 requested that SNC confirm the control room meets its design basis. SNC letter dated September 1, 2006 (ADAMS Accession No. ML062480132) provided confirmation that the HNP control room meets the applicable habitability regulatory requirements (GDC 1, 3, 4, 5, and 19). The NRC stated in response letter dated October 3, 2006 (ADAMS Accession No. ML062580134) that "The information you provided also supported the fact that you meet the intent of the GDCs for CRH."

GDC 1, "Quality Standards and Records," requires that structures, systems, and components (SSCs) important to safety be designed, fabricated, erected, and tested to quality standards commensurate with the importance of the safety functions performed.

GDC 2, "Design Basis for Protection Against Natural Phenomena," requires that SSCs important to safety be designed to withstand the effects of earthquakes and other natural hazards.

GDC 3, "Fire Protection," requires SSCs important to safety be designed and located to minimize the effects of fires and explosions.

GDC 4, "Environmental and Dynamic Effects Design Bases," requires SSCs important to safety to be designed to accommodate the effects of and to be compatible with the environmental conditions associated with normal operation, maintenance, testing, and postulated accidents, including loss-of-coolant accidents (LOCAs).

GDC 5, "Sharing of Structures, Systems, and Components," requires that SSCs important to safety not be shared among nuclear power units unless it can be shown that such sharing will not significantly impair their ability to perform their safety functions, including, in the event of an accident in one unit, the orderly shutdown and cooldown of the remaining units.

GDC 19, "Control Room," requires that a control room be provided from which actions can be taken to operate the nuclear reactor safely under normal conditions and to maintain the reactor in a safe condition under accident conditions, including a LOCA. Adequate radiation protection is to be provided to permit access and occupancy of the control room under accident conditions without personnel receiving radiation exposures in excess of specified values.

Prior to incorporation of TSTF-448, Revision 3, the STS requirements addressing CRE boundary operability resided in the CRE ventilation system specification NUREG-1433, TS 3.7.4, "Main Control Room Environmental Control (MCREC) System." In this specification, the surveillance requirement associated with demonstrating the operability of the CRE boundary required verifying that one MCREC subsystem could maintain a positive pressure relative to the areas adjacent to the CRE during the pressurization mode of operation at a makeup flow rate. Facilities that pressurize the CRE during the emergency mode of operation of the MCREC have similar surveillance requirements. Regardless, the results of ASTM E741 (Reference 2) tracer gas tests to measure CRE unfiltered inleakage at facilities indicated that the differential pressure surveillance is not a reliable method for demonstrating CRE boundary operability. That is, licensees were able to obtain differential pressure and flow measurements satisfying the SR limit even though unfiltered inleakage was determined to exceed the value assumed in the safety analyses.

In addition to an inadequate SR, the action requirements of these specifications were ambiguous regarding CRE boundary operability in the event CRE unfiltered inleakage is found to exceed the analysis assumption. The ambiguity stemmed from the view that the CRE boundary may be considered operable but degraded in this condition, and that it would be deemed inoperable only if calculated radiological exposure limits for CRE occupants exceeded a licensing basis limit; e.g., as stated in GDC-19, even while crediting compensatory measures.

NRC Administrative Letter 98-10, "Dispositioning of Technical Specifications That Are Insufficient to Assure Plant Safety," (AL 98-10) states that "the discovery of an improper or inadequate TS value or required action is considered a degraded or nonconforming condition," which is defined in NRC Inspection Manual Chapter 9900; see latest guidance in RIS 2005-20 (Reference 3). Imposing administrative controls in response to improper or inadequate TS is considered an acceptable short-term corrective action. The NRC staff expects that, following the imposition of administrative controls, an amendment to the inadequate TS, with appropriate justification and schedule, will be submitted in a timely fashion."

Licensees that have found unfiltered inleakage in excess of the limit assumed in the safety analyses and have yet to either reduce the inleakage below the limit or establish a higher bounding limit through re-analysis, have implemented compensatory actions to ensure the safety of CRE occupants, pending final resolution of the condition, consistent with RIS 2005-20. However, based on GL 2003-01 and AL 98-10, the NRC staff expects each licensee to propose TS changes that include a surveillance to periodically measure CRE unfiltered inleakage in order to satisfy 10 CFR 50.36(c)(3), which requires a facility's TS to include surveillance requirements, which it defines as "requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and *that limiting conditions for operation will be met.*" (Emphasis added.)

The NRC staff also expects facilities to propose unambiguous remedial actions, consistent with 10 CFR 50.36(c) (2), for the condition of not meeting the limiting condition for operation (LCO) due to an inoperable CRE boundary. The action requirements should specify a reasonable completion time to restore conformance to the LCO before requiring a facility to be shut down. This completion time should be based on the benefits of implementing mitigating actions to ensure CRE occupant safety and sufficient time to resolve most problems anticipated with the CRE boundary, while minimizing the chance that operators in the CRE will need to use mitigating actions during accident conditions.

2.4 Adoption of TSTF-448 Revision 3, by HNP

Adoption of TSTF-448, Revision 3, will assure that the facility's TS LCO for the MCREC System is met by demonstrating unfiltered leakage into the CRE is within limits (i.e., the operability of the CRE boundary). In support of this surveillance, which specifies a test interval (frequency) described in Regulatory Guide 1.197, TSTF-448 also adds TS administrative controls to assure the habitability of the CRE between performances of the ASTM E741 test. In addition, adoption of TSTF-448 will establish clearly stated and reasonable required actions in the event CRE unfiltered inleakage is found to exceed the analysis assumption.

The changes made by TSTF-448 to the STS requirements for the MCREC and the CRE boundary conform to 10 CFR 50.36(c) (2) and 10 CFR 50.36(c) (3). Their adoption will better assure that a plant's CRE will remain habitable during normal operation and DBA conditions. These changes are, therefore, acceptable from a regulatory standpoint.

3.0 TECHNICAL EVALUATION

The NRC staff reviewed the proposed changes against the corresponding changes made to the STS by TSTF-448, Revision 3, which the NRC staff has found to satisfy applicable regulatory requirements, as described above in Section 2.0. The emergency operational mode of the MCREC System at HNP pressurizes the CRE to minimize unfiltered air inleakage. The proposed changes are consistent with this design.

3.1 Proposed Changes

The proposed amendment would strengthen CRE habitability TS requirements by changing TS 3.7.4, MCREC System, and adding a new TS administrative controls program on CRE habitability. Accompanying the proposed TS changes are appropriate conforming technical changes to the TS Bases. The proposed revision to the Bases also includes editorial and administrative changes to reflect applicable changes to the corresponding STS Bases, which were made to improve clarity, conform to the latest information and references, correct factual errors, and achieve more consistency among the STS NUREGs. Except for plant-specific differences, all of these changes are consistent with STS as revised by TSTF-448, Revision 3.

The NRC staff compared the proposed TS changes to the STS and the STS markups and evaluations in TSTF-448. The NRC staff verified that differences from the STS were adequately justified on the basis of plant-specific design or retention of current licensing basis. In particular, the frequency of measuring the pressurization cited in new TS 5.5.14 d. is 24 months. This is greater than the 18 months cited in the TSTF 448 model, but conforms with the equivalent

frequency in HNP's existing TS in SR 3.7.3.4. The NRC staff also reviewed the proposed changes to the TS Bases for consistency with the STS Bases and the plant-specific design and licensing bases, although approval of the Bases is not a condition for accepting the proposed amendment. However, TS 5.5.10, "TS Bases Control Program," provides assurance that the licensee has established and will maintain the adequacy of the Bases. The proposed Bases for TS 3.7.4 refer to specific guidance in NEI 99-03, "Control Room Habitability Assessment Guidance," Revision 0, dated June 2001 (Reference 6), which the NRC staff has formally endorsed, with exceptions, through Regulatory Guide 1.196, "Control Room Habitability at Light-Water Nuclear Power Reactors," dated May 2003 (Reference 4).

3.2 Editorial Changes

The licensee proposed editorial changes to TS 3.7.4, "MCREC System," to establish standard terminology, such as "control room envelope (CRE)" in place of "control room." These changes improve the usability and quality of the presentation of the TS, have no impact on safety, and therefore, are acceptable.

3.3 TS 3.7.4, MCREC System

The licensee proposed to revise the action requirements of TS 3.7.4, "MCREC System", to acknowledge that an inoperable CRE boundary, depending upon the location of the associated degradation, could cause just one, instead of both MCREC subsystems to be inoperable. This is accomplished by revising Condition A to exclude Condition B, and revising Condition B to address one or more MCREC subsystems, as follows:

- Condition A One MCREC subsystem inoperable for reasons other than Condition B.
- Condition B One or more MCREC subsystem inoperable due to inoperable CRE boundary in MODE 1, 2, and 3

This change clarifies how to apply the action requirements in the event just one MCREC subsystems is unable to ensure CRE occupant safety within licensing basis limits because of an inoperable CRE boundary. It enhances the usability of Conditions A and B with a presentation that is more consistent with the intent of the existing requirements. This change is an administrative change because it neither reduces nor increases the existing action requirements, and, therefore, is acceptable.

The licensee proposed to replace existing Required Action B.1, "Restore control room boundary to OPERABLE status," which has a 24-hour Completion Time, with Required Action B.1, to immediately initiate action to implement mitigating actions; Required Action B.2, to verify, within 24 hours, that CRE occupant radiological, chemical and smoke hazards exposures will not exceed limits; and Required Action B.3, to restore CRE boundary to operable status within 90 days.

The 24-hour Completion Time of new Required Action B.2 is reasonable based on the low probability of a DBA occurring during this time period, and the use of mitigating actions as directed by Required Action B.1. The 90-day Completion Time of new Required Action B.3 is reasonable based on the determination that the mitigating actions will ensure protection of CRE occupants

within limits while limiting the probability that CRE occupants will have to implement protective measures that may adversely affect their ability to control the reactor and maintain it in a safe shutdown condition in the event of a DBA. The 90-day Completion Time is a reasonable time to diagnose, plan and possibly repair, and test most anticipated problems with the CRE boundary. Therefore, proposed Actions B.1, B.2, and B.3 are acceptable.

The licensee proposed to add a new condition to Action F of TS 3.7.4 that states, "One or more MCREC subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in secondary containment, during CORE ALTERATIONS, or during OPDRVs." The specified Required Actions proposed for this condition are the same as for the other existing condition for Action F, which states, "Two MCREC subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs." Accordingly, the new condition is stated with the other condition in Action F using the logical connector "OR". The practical result of this presentation in format is the same as specifying two separately numbered Actions, one for each condition. Its advantage is to make the TS Actions table easier to use by avoiding having an additional numbered row in the Actions table. This new condition in Action F is needed because proposed Action B will only apply in Modes 1, 2, and 3. As such, this change will ensure that the Actions table continues to specify a condition for an inoperable CRE boundary during refueling and OPDRVs. Therefore, this change is administrative and acceptable.

In operation, the MCREC System isolates unfiltered ventilation air supply intakes, filters the emergency ventilation air supply to the CRE, and pressurizes the CRE to minimize unfiltered air leakage past the CRE boundary. The licensee proposed to delete the CRE pressurization SR. This SR requires verifying that each MCREC subsystem can maintain a pressure ≥ 0.1 inches water gauge, relative to the turbine building during the pressurization mode of operation at a makeup flow rate of ≤ 2750 cfm. The deletion of this SR is proposed because measurements of unfiltered air leakage into the CRE at numerous reactor facilities demonstrated that a basic assumption of this SR, an essentially leak-tight CRE boundary, was incorrect for most facilities. Hence, meeting this SR by achieving the required CRE pressure is not necessarily a conclusive indication of CRE boundary leak tightness, i.e., CRE boundary operability. Based on the adoption of TSTF-448, Revision 3, the licensee's proposal to delete SR 3.7.4.4 is acceptable.

The proposed CRE leakage measurement SR states, "Perform required CRE unfiltered air leakage testing in accordance with the Control Room Envelope Habitability Program." The CRE Habitability Program TS, proposed TS 5.5.14, requires that the program include Requirements for determining the unfiltered air leakage past the CRE boundary into the CRE in accordance with the testing methods and at the frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0 (Reference 5). This guidance references ASTM E741 (Reference 2) as an acceptable method for ascertaining the unfiltered leakage into the CRE. The licensee has proposed to follow this method. Therefore, the proposed CRE leakage measurement SR is acceptable.

3.4 TS 5.5.14, CRE Habitability Program

The proposed administrative controls program TS is consistent with the model program TS in TSTF-448, Revision 3. In combination with SR 3.7.4.4, this program is intended to ensure the operability of the CRE boundary, which as part of an operable MCREC System, will ensure that

CRE habitability is maintained such that CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under DBA conditions without personnel receiving radiation exposures in excess of 5 rem TEDE for the duration of the accident.

A CRE Habitability Program TS acceptable to the NRC staff requires the program to contain the following elements:

Definitions of CRE and CRE boundary.

This element is intended to ensure that these definitions accurately describe the plant areas that are within the CRE, and also the interfaces that form the CRE boundary, and are consistent with the general definitions discussed in Section 2.1 of this safety evaluation. Establishing what is meant by the CRE and the CRE boundary will preclude ambiguity in the implementation of the program.

Configuration control and preventive maintenance of the CRE boundary.

This element is intended to ensure the CRE boundary is maintained in its design condition. Guidance for implementing this element is contained in Regulatory Guide 1.196 (Reference 4), which endorsed, with exceptions, NEI 99-03, Rev. 0 (Reference 6). Maintaining the CRE boundary in its design condition provides assurance that its leak-tightness will not significantly degrade between CRE inleakage determinations.

Assessment of CRE habitability at the frequencies stated in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0 (Reference 5), and measurement of unfiltered air leakage into the CRE in accordance with the testing methods and at the frequencies stated in Sections C.1 and C.2 of Regulatory Guide 1.197.

This element is intended to ensure that the plant assesses CRE habitability consistent with Sections C.1 and C.2 of Regulatory Guide 1.197. Assessing CRE habitability at the NRC accepted frequencies provides assurance that significant degradation of the CRE boundary will not go undetected between CRE inleakage determinations. Determination of CRE inleakage using test methods acceptable to the NRC staff assures that test results are reliable for ascertaining CRE boundary operability. Determination of CRE inleakage at the NRC accepted frequencies provides assurance that significant degradation of the CRE boundary will not occur between CRE inleakage determinations.

Measurement of CRE pressure with respect to all areas adjacent to the CRE boundary at designated locations for use in assessing the CRE boundary at a frequency of 24 months on a staggered test basis (with respect to the CREOAS trains).

This element is intended to ensure that CRE differential pressure is regularly measured to identify changes in pressure warranting evaluation of the condition of the CRE boundary. Obtaining and trending pressure data provides additional assurance that significant degradation of the CRE boundary will not go undetected between CRE inleakage determinations.

Quantitative limits on unfiltered leakage.

This element is intended to establish the CRE leakage limit as the CRE unfiltered infiltration rate assumed in the CRE occupant radiological consequence analyses of DBAs. Having an unambiguous criterion for the CRE boundary to be considered operable in order to meet LCO 3.7.4 will ensure that associated action requirements will be consistently applied in the event of CRE degradation resulting in leakage exceeding the limit.

Consistent with TSTF-448, Revision 3, the program states that the provisions of SR 3.0.2 are applicable to the program frequencies for performing the activities required by program paragraph number c, parts (i) and (ii) (assessment of CRE habitability and measurement of CRE leakage), and paragraph number d (measurement of CRE differential pressure).

This statement is needed to avoid confusion. SR 3.0.2 is applicable to the surveillance that references the testing in the CRE Habitability Program. However, SR 3.0.2 is not applicable to Administrative Controls unless specifically invoked. Providing this statement in the program eliminates any confusion regarding whether SR 3.0.2 is applicable, and is acceptable.

Consistent with TSTF-448, Revision 3, the licensee's proposed TS 5.5.14 states that (1) a CRE Habitability Program shall be established and implemented, (2) the program shall include all of the NRC-staff required elements, as described above, and (3) the provisions of SR 3.0.2 shall apply to program frequencies. Therefore, the proposed TS 5.5.14, is consistent with the model program TS approved by the NRC staff in TSTF-448, Revision 3, and is acceptable.

The licensee has proposed license conditions regarding the initial performance of the new surveillance and assessment requirements. The new license conditions adopted the conditions in section 2.3 of the model application published in the Federal Register on January 17, 2007 (72 FR 2022), as corrected by NRC memorandum dated February 2, 2007 (ADAMS Accession No. ML070330657). Plant specific changes were made to these proposed license conditions. The proposed plant specific license conditions are consistent with the corrected model application, and are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Georgia State official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no-significant-hazards considerations, and there has been no public comment on the finding (78 FR 54290, September 3, 2013). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, on the basis of the considerations discussed above, that (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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

7.0 REFERENCES

1. NRC Generic Letter 2003-01, "Control Room Habitability," June 12, 2003, (GL 2003-01).
2. ASTM E 741 - 00, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution," 2000, (ASTM E741).
3. NRC Regulatory Issue Summary 2005-20: Revision to Guidance Formerly Contained in NRC Generic Letter 91-18, "Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability," dated September 26, 2005 (RIS 2005-20).
4. Regulatory Guide 1.196, "Control Room Habitability at Light-Water Nuclear Power Reactors," Revision 0, dated May 2003.
5. Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003.
6. NEI 99-03, "Control Room Habitability Assessment Guidance," Revision 0, June 2001
7. LAR from SNC dated July 23, 2013 (Agencywide Documents Access and Management System (ADAMS) No. ML13205A160)
8. Southern Nuclear Operating Company letter dated September 1, 2006 (ADAMS Accession No. ML062480132)

Principal contributor: M. Hamm, NRR/DSS

Date: August 29, 2014

August 29, 2014

Mr. C. R. Pierce
Regulatory Affairs Director
Southern Nuclear Operating Company, Inc.
Post Office Box 1295, Bin - 038
Birmingham, AL 35201-1295

SUBJECT: EDWIN I. HATCH NUCLEAR PLANT, UNIT NOS. 1 AND 2, ISSUANCE OF
AMENDMENTS REGARDING CONTROL ROOM HABITABILITY (TAC NOS.
MF2513 AND MF2514)

Dear Mr. Pierce:

The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment No. 268 to Renewed Facility Operating License DPR-57 and Amendment No. 212 to Renewed Facility Operating License NPF-5 for the Edwin I. Hatch Nuclear Plant, Unit Nos. 1 and 2, respectively. The amendments revise the Technical Specifications (TSs) in response to your application dated July 23, 2013 and August 5, 2014.

These amendments revise the TS action and surveillance requirements in Specification 3.7.4, "Main Control Room Environmental Control (MCREC) System," and add a new administrative controls program, Specification 5.5.14, "Control Room Envelope Habitability Program." The purpose of the changes is to ensure that control room envelope (CRE) boundary operability is maintained and verified through effective surveillance and programmatic requirements, and that appropriate remedial actions are taken in the event of an inoperable CRE boundary.

A copy of the related Safety Evaluation is also enclosed. A Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Robert Martin, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 268 to DPR-57
2. Amendment No. 212 to NPF-5
3. Safety Evaluation

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