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December 22, 2014

Docket Nos.: 50-321
50-366

NL-14-2060

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

Edwin I. Hatch Nuclear Plant
50.54(q) Evaluation Performed on a New Revision of the
Emergency Plan On-Shift Staffing Analysis Supplement Report

References:

1. Southern Nuclear Operating Company letter to the NRC, *Edwin I. Hatch Nuclear Plant On-Shift Staffing Analysis*, dated January 18, 2013 (NL-13-0065)
2. Southern Nuclear Operating Company letter to the NRC, *Edwin I. Hatch Nuclear Plant On-Shift Staffing Analysis Supplement*, dated February 5, 2013 (NL-13-0187)
3. Southern Nuclear Operating Company letter to the NRC, *Edwin I. Hatch Nuclear Plant – Units 1 and 2 Emergency Preparedness Information Requested by NRC Letter, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Daiichi Accident,"* dated April 30, 2013 (NL-13-0764)
4. Southern Nuclear Operating Company letter to the NRC, *Edwin I. Hatch Nuclear Plant On-Shift Staffing Analysis Supplement*, dated October 07, 2014 (NL-14-1185)
5. NEI 10-05, *Assessment of On-Shift ERO Staffing and Capabilities*, Revision 0, June 2011
6. NEI 12-01, *Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities*, Revision 0, May 2012

Ladies and Gentlemen:

Southern Nuclear Operating Company (SNC) submitted information pursuant to Title 10 of the Code of Federal Regulations (10 CFR) 50.54(q)(5) via Reference 1 to the Nuclear Regulatory Commission (NRC) regarding the on-shift staffing

analysis performed for Edwin I. Hatch Nuclear Plant (HNP) per Reference 5. Subsequently, SNC submitted supplemental information to Reference 1 via Reference 2 regarding the assignment of compensatory measures required as a result of the staffing analysis. Reference 1 stated that the 10 CFR 50.54(q) evaluation performed for the HNP NEI 10-05 On-Shift Staffing Analysis Report (hereafter referred to as "10-05 report") concluded the minimum staff identified in Table B-1 of the HNP Emergency Plan is adequate to respond to the scenarios identified in the regulations until relieved by the augmented Emergency Response Organization, with the exception of NRC Event Notifications made by the Shift Manager for the Aircraft Probability Threat and Control Room Fire events.

While reviewing the 10-05 report for a future license amendment request, a third-party vendor notified SNC of a possible discrepancy between the 10-05 report and the HNP Emergency Plan. After further research, the discrepancy was confirmed, and it was determined that the minimum staffing level identified in Table B-1 of the HNP Emergency Plan differs from the minimum staffing level identified in the 10-05 report. Therefore, the conclusion submitted in Reference 1 should have stated that the most limiting event in the study requires 16 Operations personnel, that the minimum staffing identified in the HNP Emergency Plan is not consistent with this number of Operations personnel, and that a compensatory measure is required. This error was captured in the SNC Corrective Action Program. A compensatory measure was put in place on Thursday, July 17, 2014 to assure the minimum Operations staffing is not below the number identified in the 10-05 report on any given shift.

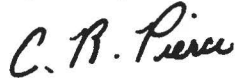
In Reference 4, the Southern Nuclear Operating Company letter to the NRC, Edwin I. Hatch Nuclear Plant On-Shift Staffing Analysis Supplement, dated October 07, 2014 (NL-14-1185), a more detailed explanation of how SNC should address the items in Reference 5 and 6 is discussed as well as the need to evaluate a future revision change to the HNP Emergency Plan.

Subsequently a new On-Shift Staffing Analysis was conducted, using the structured approach provided in NEI 10-05: Assessment of On-Shift Emergency Response. The results have confirmed that the existing staffing provided in the current version of the HNP Emergency Plan is adequate and resolves the conflicts identified in the previous 10-05 report. As this staffing assessment provides the technical basis for the minimum shift staffing provided in the HNP Emergency Plan, the results of this assessment were evaluated pursuant to 10 CFR 50.54(q)(3) and determined not to result in a reduction of the effectiveness of the HNP Emergency Plan.

In accordance with 10 CFR 50.54(q), Southern Nuclear Operating Company (SNC) hereby submits a 30 day notification that the above stated changes have been made to the technical basis for the HNP Emergency Plan as it relates to Organization Staffing and Capability.

This letter contains no NRC commitments. If you have any questions, please contact Ken McElroy at (205) 992-7369.

Respectfully submitted,



C. R. Pierce
Regulatory Affairs Director

CRP/GLS

cc: Southern Nuclear Operating Company
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