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October 19, 1979

R. J. Kelly
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Washington, D. C. 20555



NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2
COMMITMENTS REGARDING THE SHORT-TERM RECOMMENDATIONS
OF TMI-2 LESSONS LEARNED TASK FORCE

Gentlemen:

On September 24, 1979, Georgia Power Company received the U. S. Nuclear Regulatory Commission's request for our commitment to meet the requirements cited by NUREG-0578 and the staff's Emergency Preparedness Studies. Those requirements have been the subject of an extensive review on the part of Georgia Power Company, its consultants, and the nuclear industry since their issuance. We hereby submit, pursuant to your request, our commitment to the implementation of those requirements as described in Attachment 1 of this letter.

Georgia Power Company is proceeding to implement those actions which are applicable to Plant Hatch on the schedule specified by Enclosures 6 and 8 of your letter of September 13, 1979, as permitted by existing technology and restraints. The criteria by which many of the requested actions are to be achieved have not been clearly identified. Georgia Power Company is working with the BWR Owner's Group to develop suitable implementation criteria. Certain of these criteria have been developed, and were submitted to the NRC by the BWR Owner's Group on October 17, 1979. The remaining criteria are scheduled to be submitted on November 15, 1979. Georgia Power Company expects to utilize these criteria to implement the required actions as outlined in Attachment 1.

Attachment 2 to this letter provides additional plant specific information concerning the capabilities for high point venting which was requested by the NRC during the recent topical meetings of October 10 through 12.

It is anticipated that further correspondence may be required for amplification or clarification of these matters. Should you have any questions or comments on our efforts in this regard, please contact this office.

Yours very truly,


R. J. Kelly

WEB/mb
Attachments

xc: Mr. Ruble A. Thomas
George F. Trowbridge, Esquire
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ATTACHMENT 1

NEAR TERM REQUIREMENTS OF NUREG-0578

2.1.1 Emergency Power Supply

Georgia Power Company concurs with the BWR Owner's Group implementation criteria.

2.1.2 Relief and Safety Valve Test

Georgia Power Company concurs with the BWR Owner's Group implementation criteria.

2.1.3.A Direct Position Indication of Relief and Safety Valves for PWR's and BWR's

Plant Hatch Units 1 and 2 presently utilize valve position indication systems similar to that described in the BWR Owner's Group Implementation criteria. A design review of the systems are currently being conducted. If the design of the systems do not meet the implementation criteria, the systems will either be modified or justification for not modifying the system will be provided.

2.1.3.B Instrumentation For Inadequate Core Cooling

Georgia Power Company concurs with the BWR Owner's Group implementation criteria and will resolve this request accordingly.

2.1.4 Containment Isolation

Georgia Power Company concurs with the BWR Owner's Group implementation criteria and will resolve this request accordingly.

2.1.5.A Dedicated H₂ Control Penetrations

Georgia Power Company has reviewed the design of the penetrations for the Hatch Unit 1 purge system and the Hatch Unit 2 Hydrogen Recombiner System and concludes that it meets the staff positions contained in NUREG-0578.

2.1.5.C Recombiners

Plant Hatch Unit 1 does not utilize hydrogen recombiners; therefore, this concern is not applicable to Unit 1. Unit 2 utilizes permanently installed redundant hydrogen recombiners that are remotely operated from the control room; therefore, the concern for shielding is not applicable. A review of the procedures for using the Unit 2 hydrogen recombiners will be made.

2.1.6.A Integrity of Systems Outside Containment Likely to Contain Radioactive Materials

The BWR Owner's Group Implementation Criteria for this item will be submitted to the NRC by November 15, 1979. A leak reduction program and preventive maintenance program are currently being developed for Plant Hatch.

ATTACHMENT 1 (Continued)

NEAR TERM REQUIREMENTS OF NUREG-0578

2.1.6.B Design Review of Plant Shielding

The BWR Owner's Group Implementation Criteria for this item will be submitted to the NRC by November 15, 1979. A shielding design review is currently being conducted.

2.1.7.A Auto Initiation of the Auxiliary Feedwater System (AFWS)

This item is not applicable to BWR.

2.1.7.B Auxiliary Feedwater Flow Indication to Steam Generators

This item is not applicable to BWR.

2.1.8.A Post Accident Sampling Capability

The BWR Owner's Group Implementation Criteria for this item will be submitted to the NRC by November 15, 1979. A design review of post accident sampling capability is currently being conducted.

2.1.8.B Interim Procedures for Quantifying High Level Accidental Radioactivity Releases

Georgia Power Company concurs with the BWR Owner's Group implementation criteria and will resolve this request accordingly.

2.1.8.C Inplant Iodine Instrumentation

Georgia Power Company concurs with the BWR Owners' Group implementation criteria and will resolve this request accordingly.

2.1.9 Transient and Accident Analysis

Georgia Power Company concurs with the BWR Owner's Group implementation criteria and will resolve this request accordingly.

ACRS Containment Pressure, Water Level, and Hydrogen Indication

Design reviews of the containment pressure, water level, and hydrogen indication systems are currently being made. If the design of the systems do not meet the BWR Owner's Group Implementation Criteria, the systems will either be modified or justification for not modifying the systems will be provided.

ACRS Reactor Coolant System Venting

Georgia Power Company concurs with the BWR Owner's Group implementation criteria.

2.2.1.A Shift Supervisor Responsibility

Following the accident of TMI-2, a review of the procedures governing the shift supervisors' responsibilities at Plant Hatch was conducted.

ATTACHMENT 1 (Continued)

NEAR TERM REQUIREMENTS OF NUREG-0578

Georgia Power Company agrees with the intent of the staff's position. However, exception is taken to item 2.b of the staff's position in Appendix A of NUREG-0578. There may be special circumstances in accident situations where the shift supervisor may most effectively control the activities of the plants' operators from other than the control room. While it is recognized that the most effective location for the supervisor is the control room in all but the rare case, we reserve the option of allowing the shift supervisor to conduct his supervisory efforts from the most advantageous position after adequate provision for control room coordination has been made.

2.2.1.B Shift Technical Advisor

Georgia Power Company concurs with the BWR Owner's Group implementation criteria and will resolve this request accordingly.

2.2.1.C Shift and Relief Turnover Procedures

Following the accident at TMI-2, a review was conducted of the shift and relief turnover procedures at Plant Hatch. It is also Georgia Power Company's intent to implement the BWR Owner's Group Criteria.

2.2.2.A Control Room Access

Georgia Power Company concurs with the BWR Owner's Group implementation criteria and will resolve this request accordingly.

2.2.2.B Onsite Technical Support Center

Georgia Power Company concurs with the BWR Owner's Group implementation criteria and will resolve this request accordingly.

2.2.2.C Onsite Operational Support Center

Georgia Power Company concurs with the BWR Owner's Group implementation criteria and will resolve this request accordingly.

NEAR TERM REQUIREMENTS FOR IMPROVING EMERGENCY PREPAREDNESS

- (1) The Plant Hatch Emergency Plan was developed with Regulatory Guide 1.101 as a guideline and no further action should be required.
- (2) The implementation of the related recommendations of the Lessons Learned Task Force is discussed elsewhere in this letter.
- (3) Establishment of emergency operations center for Federal, State and Local personnel will be implemented upon the action of these agencies. Communications and other requirements will be provided per future discussions and agreements with the responsible agencies.

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ATTACHMENT 1 (Continued)

NEAR TERM REQUIREMENTS FOR IMPROVING EMERGENCY PREPAREDNESS

- (4) The required offsite monitoring capabilities will be provided when appropriate criteria are established and agreed upon.
- (5) The Plant Hatch Emergency Plan has been approved and is in place. It is compatible with the State of Georgia's Emergency Plan now under review by the NRC.
- (6) Such test exercises are conducted periodically, on a schedule consistent with requirements.

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ATTACHMENT 2

DESCRIPTIVE INFORMATION FOR REACTOR COOLANT SYSTEM VENTING

Each of the Hatch units is provided with eleven safety relief valves, remotely operable from the Main Control Room. The SRV's are connected to the main steam lines and are within the primary containment. The valves and their operators are qualified for the LOCA environment. The air supply to seven (the ADS valves) of the SRV's have backup air accumulators.

The RPV head vent valves are remotely operable from the main control room. The valves are normally closed with solenoids that are normally de-energized. The head vent line discharges to the drywell sump.

The HPCI and RCIC pumps are steam driven.

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