

## NRR-DRMAPEm Resource

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**From:** Lamb, John  
**Sent:** Friday, October 4, 2019 11:06 AM  
**To:** Enfinger, Timothy Lee  
**Cc:** Lowery, Ken G.  
**Subject:** Request For Additional Information (RAI) - Hatch TSTF-51 LAR (L-2019-LLA-0091)

**Importance:** High

Mr. Enfinger:

By letter dated April 24, 2019, Southern Nuclear Operating Company, Inc. (SNC, the licensee) submitted a license amendment request (LAR) for the Edwin I. Hatch Nuclear Plant, Units 1 and 2, (Agencywide Documents Access and Management System Accession No. ML19114A456; EPID L-2019-LLA-0091) to revise certain Technical Specifications (TSs) to remove the requirements for engineered safety feature systems (e.g., secondary containment, secondary containment valve isolation capability, and standby gas treatment system) to be operable after sufficient radioactive decay of irradiated fuel has occurred following a plant shutdown.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed your application and has determined that additional information is needed to complete its review. The NRC staff has developed the enclosed request for additional information (RAI) in support of its review of the subject LAR.

The SNC staff stated that SNC would provide a response to the RAI within 30 days of this email.

If you have questions, you can contact me at 301-415-3100.

Sincerely,  
John G. Lamb, Senior Project Manager

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### REQUEST FOR ADDITIONAL INFORMATION (RAI)

By letter dated April 24, 2019, Southern Nuclear Operating Company, Inc. (SNC, the licensee) submitted a license amendment request for the Edwin I. Hatch Nuclear Plant (HNP), Units 1 and 2, (Agencywide Documents Access and Management System Accession No. ML19114A456; EPID L-2019-LLA-0091) to revise certain Technical Specifications (TSs) to remove the requirements for engineered safety feature systems (e.g., secondary containment, secondary containment valve isolation capability, and standby gas treatment system) to be operable after sufficient radioactive decay of irradiated fuel has occurred following a plant shutdown.

The NRC staff has reviewed your application and has determined that additional information is needed to complete its review.

#### 1.0 **Regulatory Evaluation**

The regulation 10 CFR 30.36 states:

(2) *Limiting conditions for operation.* (i) Limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor

or follow any remedial action permitted by the technical specifications until the condition can be met. When a limiting condition for operation of any process step in the system of a fuel reprocessing plant is not met, the licensee shall shut down that part of the operation or follow any remedial action permitted by the technical specifications until the condition can be met. In the case of a nuclear reactor not licensed under § 50.21(b) or § 50.22 of this part or fuel reprocessing plant, the licensee shall notify the Commission, review the matter, and record the results of the review, including the cause of the condition and the basis for corrective action taken to preclude recurrence. The licensee shall retain the record of the results of each review until the Commission terminates the license for the nuclear reactor or the fuel reprocessing plant. In the case of nuclear power reactors licensed under § 50.21(b) or § 50.22, the licensee shall notify the Commission if required by § 50.72 and shall submit a Licensee Event Report to the Commission as required by § 50.73. In this case, licensees shall retain records associated with preparation of a Licensee Event Report for a period of three years following issuance of the report. For events which do not require a Licensee Event Report, the licensee shall retain each record as required by the technical specifications.

(ii) A technical specification limiting condition for operation of a nuclear reactor must be established for each item meeting one or more of the following criteria:

(A) *Criterion 1.* Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

(B) *Criterion 2.* A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

(C) *Criterion 3.* A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

(D) *Criterion 4.* A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

## **2.0 Request for Additional Information**

By letter dated September 4, 2019 (ADAMS Accession No. ML19198AA104), the NRC issued Amendment Nos. 298 and 243 to HNP, Units 1 and 2, respectively. Amendment No. 298 changed TS pages 3.6-34 through 3.6-36 for HNP, Unit 1. Amendment No. 243 changed TS pages 3.6-33 through 3.6-35 for HNP, Unit 2.

By letter dated April 24, 2019, SNC provided marked up TS pages 3.6-34 and 3.6-35 for HNP, Unit 1, and TS pages 3.6-33 and TS 3.6-34 for HNP, Unit 2 in Attachment 1. These TS pages contained in the letter dated April 24, 2019, no longer represent the current TS authority file. Please supplement the letter dated April 24, 2019, with the correct TS authority file TS pages marked up.

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