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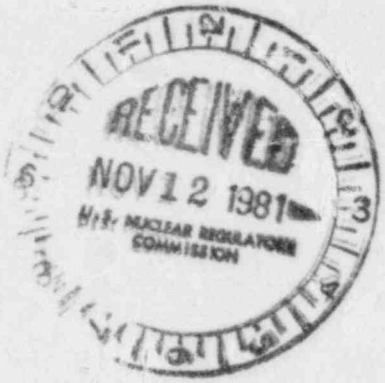
Georgia Power
the southern electric system

J. T. Beckham, Jr.
Vice President and General Manager
Nuclear Generation

November 4, 1981



Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2
NUREG-0737 ITEMS II.F.1.1 AND II.F.1.2

Gentlemen:

Your letter of October 5, 1981 requested that any technical deviations from the stated positions of items II.F.1.1 and II.F.1.2 of NUREG-0737 be submitted for review. Further, it was requested that the need for any extensions be brought to the NRC's attention. A request for extension of the implementation schedule for these particular items was included among other NUREG-0737 items in a request dated November 4, 1981. This letter will not, therefore, further address a request for extension. We have, however, determined a technical exception to the stated NUREG-0737 position on these items.

Item II.F.1.2 required provisions for effluent monitoring of radioiodines for the accident condition. It was stated that the design of the systems for the sampling of particulates and iodines should provide for sample nozzle entry velocities which are approximately isokinetic with expected induct or instack air velocities. Georgia Power Company hereby requests exception to this requirement for the reason described herein.

The error associated with anisokinetic sampling is negligible for small particulates. Releases of radioactive iodines and/or particulates from the E. I. Hatch Plant take place through either the off-gas system stack or the reactor building exhaust vent. Before being released, these effluents pass through HEPA filters which trap large particulates. Sampling will take place downstream of these filters. Although the sample will be taken at a constant flow rate irrespective of the flow through the duct or stack, no significant error will result because of the particulate size distribution resulting from HEPA filtration.

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Georgia Power

If you have further questions, please contact this office.

Very truly yours,

J. T. Beckham, Jr.

JH/mb

xc: M. Manry
R. F. Rogers, III