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

June 4, 1982

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  
POST TMI REQUIREMENTS IMPLEMENTATION SCHEDULE

Gentlemen:

Your letter of May 5, 1982, (Generic letter number 82-10) requested confirmation of completion, or a schedule for completion, for a number of requirements promulgated by NUREG-0737. Enclosure 1 to this letter responds to that request.

Implementation dates listed in Enclosure 1 have been estimated for those items still pending completion. Enclosure 2 contains our request for certain extensions of schedule and provides an explanation of the requested extensions.

In previous correspondence, we have discussed our need for extensions of schedule and the uncertainty in scheduling items of this complexity for completion. The uncertainty discussed in these previous submittals applies as well to the enclosed schedule, and in some cases conformance with the schedule may be precluded by factors beyond our control.

We feel that flexibility in scheduling is justified by the nature of these enhancements and the interim alternatives previously provided under the requirements of NUREG-0578.

If you should require further information concerning this response to your request, please contact this office.

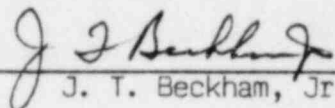
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Page Two

J. T. Beckham, Jr. states that he is Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that to the best of his knowledge and belief the facts set forth in this letter are true.

GEORGIA POWER COMPANY

By:   
J. T. Beckham, Jr.

Sworn to and subscribed before me this 4th day of June, 1982

  
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Notary Public

WEB/mb      Notary Public, Georgia, State at Large  
My Commission Expires Sept. 20, 1983

Enclosure

xc: H. C. Nix  
R. F. Rogers, III  
J. P. O'Reilly (NRC-Region II)

Attachment to June 4, 1982 letter  
Implementation Date

<u>NUREG-0737 ITEM</u>	<u>SCHEDULED COMPLETION DATE</u>
I.A.1.3.1 Limit Overtime	Completed January 22, 1981
I.A.1.3.2 Minimum Shift Crew	Completed <sup>(1)</sup> January 4, 1982
I.C.1 Revise Emergency Procedures	Startup from outage following Cycle 6 for Unit 1 and Cycle 4 for Unit 2 scheduled for the spring of 1984
I.D.1 Control Room Design Review	No reply required per 82-10 letter
I.D.2 SPDS	No reply required per 82-10 letter
II.B.1 RCS Vents	No reply required per 82-10 letter
II.B.2.3 Plant Shielding-Equipment Qualification	No reply required per 82-10 letter
II.F.2 Inadequate core cooling instrumentation	No reply required per 82-10 letter
II.K.3.18 ADS Actuation	October, 1982
II.K.3.30 and 31 SBLOCA Analysis	Completed October 1981 (Ref: GPC letter of October 23, 1981)
III.A.1.2 Staffing Levels for Emergency Situations	Completed; Emergency Plan submitted to NRC on January 2, 1981 (2)
III.A.1.2 Upgrade Emergency Support Facilities	October, 1982
III.A.2.2 Meteorological Data	December, 1983
III.D.3.4 Control Room Habitability	Completed December 31, 1980

Notes:

(1) Revision to Technical Specifications to reflect minimum staffing to be submitted in June, 1982

(2) Exception to 30 minute post-accident reporting by augmenting plant staff personnel was taken by the Emergency Plan (see page B-1 of the Emergency Plan)

ENCLOSURE 2

Attachment of June 4, 1982 letter  
Schedule Explanation

I.C.1 Revise Emergency Procedures

Scheduled Completion Date: See Enclosure 1

a) Justification

NUREG-0737 Item I.C.1, "Guidance For The Evaluation And Development Of Procedures For Transients And Accidents," specifies the first refueling outage after January 1, 1982 as the implementation date for procedures developed through the I.C.1 effort. However, as noted in our letter of December 15, 1980, this program is of a highly complex nature in terms of development and training, and a completion date cannot be accurately forecasted.

The Emergency Procedure Guidelines for Boiling Water Reactors (BWR), NEDO-24934, are still under revision (reference to BWR Owners Group letter BWROG-8156 to Mr. Darrell G. Eisenhut of the NRC staff dated September 8, 1981) and have not yet been approved by the NRC for implementation by operating plants, nor has NUREG-0799 been available in its final form for use. Implementation has been impractical because of these circumstances. Further, a problem exists concerning the availability of sufficient time on plant simulators for the training of operators in the new symptom-based approach to emergency procedures. Georgia Power Company has undertaken the development of a plant specific control room simulator to be located on the Plant Hatch site. This device is tentatively scheduled to be available for training in the fall of 1982. It is anticipated that sufficient time will be available for operator training on the Plant Hatch simulator to allow implementation of the symptom-based procedures in the summer of 1983.

b) Need for Relief

We hereby request an extension of the implementation deadline to the startup of the refueling outage after Cycle 6 for Unit 1 and Cycle 4 for Unit 2 scheduled for the spring of 1984. Failure to receive such an extension would result in inadequate review and training by plant operators in these new procedural methods of emergency operation.

c) Interim Compensatory Measures

No compensatory measures are required. Present event-oriented procedures are fully adequate and will remain in effect until new procedures are written and plant operators are trained in using them.

III.A. 2. 2 Meteorological Data

Scheduled Completion Date: December, 1983

a) Justification

NUREG-0737 Item III.A.2.2 requires capability to assess and monitor offsite radiological conditions after an accident. Implementation of this requirement at Plant Hatch requires installation of a new meteorological tower and an on-line computer system to collect data and perform calculations. Long lead times for engineering and equipment procurement prevent implementation of this requirement by the recommended date of October 1, 1982.

b) Need for Relief

We hereby request an extension to permit design, procurement and installation of a met data system without unreasonable strain on manpower and financial resources.

c) Interim Compensatory Measures

Met tower installation is scheduled for December, 1982. On-line computer model is scheduled for December, 1983 implementation. Dose assessment is performed by hand calculation using data from the existing met tower or from the new tower when installed. Formulas used for dose assessment are based on conservative assumptions and bound results that would be obtained from an on-line computer model.