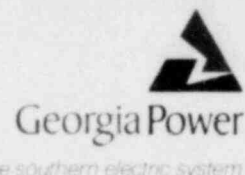


Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-7020

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

June 7, 1982



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

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
REVISION TO RESPONSE TO GENERIC LETTER 82-05

Gentlemen:

Your letter of March 17, 1982, (Generic letter number 82-05) requested confirmation of completion, or a schedule for completion, for a number of requirements promulgated by NUREG-0737. Georgia Power Company responded to that request in a letter dated April 20, 1982. Mr. Morton Fairtile of your office contacted us on May 26, 1982, to request that implementation schedules be given in terms of scheduled refueling outages rather than specific dates. We understand that our schedule is automatically extended if there is a delay in a scheduled outage.

We hereby submit Enclosures 1 and 2 which supersede those in our letter of April 20, 1982. The schedule of implementation has been given in terms of outages instead of dates derived from our current outage schedule.

This information confirms information given to Mr. Fairtile on May 26, 1982 by telephone. Please contact this office if you need additional information.

W. A. Widner 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: W. A. Widner
W. A. Widner

Sworn to and subscribed before me this 7th day of June, 1982


B. B. B.

Notary Public

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

8206170376 820607
PDR ADOCK 05000321
P PDR

AOA

Georgia Power 

Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555
June 7, 1982
Page Two

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

Attachment to June 7, 1982 letter

Enclosure 1

IMPLEMENTATION SCHEDULE

<u>ITEM</u>	<u>UNIT 1</u>	<u>UNIT 2</u>
NUREG-0737	<u>Scheduled Completion Date</u>	<u>Scheduled Completion Date</u>
I.A.3.1 Simulator Exams	Complete 10-1-81	Complete 10-1-81
II.B.2 Plant Shielding	Complete 4-15-82	Complete 4-15-82
II.B.3 Post Accident Sampling	End of outage following cycle 5b, currently scheduled for Spring, 1983	End of outage following cycle 3, currently scheduled for Spring, 1983
II.B.4 Core Damage Training	Complete 10-1-81	Complete 10-1-81
II.E.4.2(5) Pressure setpoint	Complete ⁽¹⁾	Complete ⁽¹⁾
II.E.4.2(7) Purge/Vent Isolation	Criteria pending negotiations	-
II.F.1(1) Noble gas monitor	End of outage following cycle 5b, currently scheduled for Spring, 1983 ⁽⁴⁾	End of outage following cycle 3, currently scheduled for Spring, 1983 ⁽⁴⁾
II.F.1(2) Effluent Monitors	End of outage following cycle 5b, currently scheduled for Spring, 1983 ⁽⁴⁾	End of outage following cycle 3, currently scheduled for Spring, 1983 ⁽⁴⁾
II.F.1(3) Containment Radiation Monitors	End of outage following cycle 5b, currently scheduled for Spring, 1983 ⁽⁴⁾	Complete with the exception of Technical Specifications submittal: June 1, 1982 ⁽⁴⁾
II.F.1(4) Containment Pressure Monitor	End of outage following cycle 5b, currently scheduled for Spring, 1983 ⁽⁴⁾	Complete with the exception of Technical Specifications submittal: June 1, 1982 ⁽⁴⁾
II.F.1(5) Containment Water Level Monitor	Complete ⁽²⁾	Complete ^(?)
II.F.1(6) Hydrogen Concentration Monitor	Complete ⁽²⁾	Complete ^(?)
II.K.3.15 HPCI/RCIC Modification	Complete 7-1-81	Complete 7-1-81
II.K.3.22 RCIC Suction Modification	End of outage following cycle 6, currently scheduled for Spring, 1984	End of outage following cycle 4, currently scheduled for Spring, 1984
II.K.3.24 HPCI/RCIC Space Cooling	Complete ⁽¹⁾	Complete ⁽¹⁾
II.K.3.27 Common Reference Level	Complete ⁽³⁾ 3-1-82	Complete ⁽³⁾ 3-1-82

¹No modification required, original design satisfactory

²Equipment originally installed; under upgrade program of I&E Bulletin 79-01B

³Pending issuance of editorial changes to Technical Specifications

⁴Technical Specifications to be submitted, but approval schedule is beyond our control

ENCLOSURE 2

SCHEDULE EXPLANATION

II.B.3 - Post Accident Sampling

Unit 1:

Scheduled Completion Date: End of refueling outage following cycle 5b, currently scheduled for Spring, 1983

a) Justification

NUREG-0737, Item II.B.3 directed the implementation of post-accident sampling capability by January 1, 1982. Georgia Power Company's response of December 15, 1980 committed to meet this requirement to the extent allowed by commercially available equipment.

We were not able to meet the NRC's implementation date of January 1, 1982 for the following reasons. The issuance of Regulatory Guide 1.97, Revision 2 imposed additional requirements on the post-accident sampling system, making it necessary to revise our specifications. This revision caused a significant delay in our system design. In addition, one of our suppliers experienced a work stoppage and was unable to deliver according to the schedule.

b) Need

Failure to receive such an extension will require a plant outage upon receipt of parts resulting in lost generation during the installation of components in areas inaccessible during normal operation.

c) Interim Compensatory Measures

A system composed of two components presently provides adequate sampling capability in the event of an accident during the interim period. One component consists of an interim reactor coolant sampling subsystem installed in response to NUREG 0578. The other component consists of the sampling station for drywell atmosphere which is used for such samples during normal operations. Under the source and shielding assumptions of NUREG 0737, this drywell atmosphere sample station can be used in a post accident environment.

Unit 2:

Scheduled Completion Date: End of refueling outage following cycle 3, currently scheduled for Spring, 1983

a) Justification

NUREG-0737, Item II.B.3 directed the implementation of post-accident sampling capability by January 1, 1982. Georgia

Attachment to June 7, 1982 letter

ENCLOSURE 2

SCHEDULE EXPLANATION (Continued)

Power Company's response of December 15, 1980 committed to meet this requirement to the extent allowed by commercially available equipment.

We were not able to meet the NRC's implementation date of January 1, 1982 for the following reasons. The issuance of Regulatory Guide 1.97, Revision 2 imposed additional requirements on the post-accident sampling system, making it necessary to revise our specifications. This revision caused a significant delay in our system design. In addition, one of our suppliers experienced a work stoppage and was unable to deliver according to schedule. We were unable in our 1982 outage to complete all aspects of installation in areas which are inaccessible during operation due to lack of delivery of nuclear qualified solenoid valves. Another refueling outage will therefore be needed to complete installation.

b) Need

See Unit 1 discussion.

c) Interim Compensatory Measures

See Unit 1 discussion.

II.F.1(1) Noble Gas Monitor

Unit 1:

Scheduled Completion Date: End of refueling outage following cycle 5b, currently scheduled for Spring, 1983

a) Justification

NUREG-0737, Item II.F.1.1 required the installation of high range noble gas effluent monitors. An implementation deadline of January 1, 1982 was given. Georgia Power Company's response of December 15, 1980 committed to meet this requirement to the extent allowed by commercially available equipment.

Georgia Power Company has attempted to implement this item according to the NUREG-0737 schedule. However parts and documentation for complete installation could not be obtained for an outage of sufficient duration prior to January 1, 1982.

Attachment to June 7, 1982 letter

ENCLOSURE 2

SCHEDULE EXPLANATION (Continued)

b. Need

An outage is required to install probes in plant effluent lines. Failure to receive an extension will require a plant outage upon receipt of parts resulting in lost generation during the installation of these probes in areas inaccessible during normal plant operations.

c) Interim Compensatory Measures

Interim measures for quantifying high level releases and in-plant iodine have been implemented as described by our January 25, 1980 letter submitted in response to NUREG-0578.

Unit 2:

Scheduled Completion Date: End of refueling outage following cycle 3, currently scheduled for Spring, 1983

a) Justification

See Unit 1 discussion.

b) Need

Installation of equipment in normally inaccessible areas was made during the recent Unit 2 outage. However, certain equipment which can be installed during plant operation will not be available until later this year. A recorder, for example, is not expected to be delivered until June 1, 1982. Completion of implementation will be accomplished upon receipt of all materials.

c) Interim Compensatory Measures

See Unit 1 discussion.

II.F.1(2) Effluent Monitors

Unit 1:

Scheduled Completion Date: End of refueling outage following cycle 5b, currently scheduled for Spring, 1983

a) Justification

NUREG-0737, Item II.F.1.2 required the installation of provisions for radioiodine effluent sampling at accident conditions. An

ENCLOSURE 2

SCHEDULE EXPLANATION (Continued)

implementation deadline of January 1, 1982 was given. Georgia Power Company's response of December 15, 1980 committed to meet this requirement to the extent allowed by commercially available equipment.

Georgia Power Company has attempted to implement this item according to the NUREG-0737 schedule. However parts and documentation for complete installation could not be obtained for an outage of sufficient duration prior to January 1, 1982.

b) Need

We hereby request an extension of the implementation deadline to the end of the refueling outage expected to begin in September 1982. All components and associated documentation are expected to be delivered by that time. An outage is required to install probes in plant effluent lines. Failure to receive such an extension will require a plant outage upon receipt of parts resulting in lost generation during the installation of these probes in areas inaccessible during normal plant operations.

c) Interim Compensatory Measures

Interim measures for quantifying high level releases and in-plant iodine have been implemented as described by our January 25, 1980 letter submitted in response to NUREG-0578.

Unit 2:

Scheduled Completion Date: End of refueling outage following cycle 3, currently scheduled for Spring, 1983

a) Justification

See Unit 1 discussion.

b) Need

Installation of equipment in normally inaccessible areas was made during the recent Unit 2 outage. However, certain equipment which can be installed during plant operation will not be available until later this year. A recorder, for example, is not expected to be delivered until June 1, 1982. Completion of implementation will be accomplished upon receipt of all materials.

c) Interim Compensatory Measures

See Unit 1 discussion.

Attachment to June 7, 1982 letter

ENCLOSURE 2

SCHEDULE EXPLANATION (Continued)

II.F.1(3) - Containment Radiation Monitors

Unit 1:

Scheduled Completion Date: End of refueling outage following cycle 5b, currently scheduled for Spring, 1983

a) Justification

NUREG-0737, Item II.F.1.3 required the installation of high-range containment radiation monitors by January 1, 1982. Georgia Power Company's response of December 15, 1980, committed to meet these requirements to the extent allowed by commercially available equipment.

Georgia Power Company has made every reasonable effort to implement this item according to the NUREG-0737 schedule. However, we found that it was impossible to meet the January 1, 1982 deadline. Parts and documentation necessary for a complete installation could not be obtained for an outage of sufficient duration prior to January 1, 1982. This was due to the limited number of suppliers, high demand, and long lead times for some of the necessary components.

b) Need

We hereby request an extension of the implementation schedule to the end of the refueling outage expected to begin in September 1982. All components and associated documentation are expected to be delivered before the beginning of that outage. Failure to receive an extension will result in a plant outage and lost generation for installation of components in areas inaccessible during operation upon receipt of those components.

c) Interim Compensatory Measures

Sections 7.6.4.2 and 11.4.2.8.12 of the Unit 2 Final Safety Analysis Report describe the containment post accident gamma radiation monitors available on Unit 1 as an interim monitoring device.

Attachment to June 7, 1982 letter

ENCLOSURE 2

SCHEDULE EXPLANATION (Continued)

II.F.1(4) Containment Pressure Monitor

Unit 1:

Scheduled Completion Date: End of refueling outage following cycle 5b, currently scheduled for Spring, 1983

a) Justification

NUREG-0737, Item II.F.1.4 required the provision for continuous indication of containment pressure in the control room. The implementation deadline for this modification was January 1, 1982. Georgia Power Company's response of December 15, 1980 committed to meet these requirements to the extent allowed by commercially available equipment.

Georgia Power Company has made every reasonable effort to implement this item according to the NUREG-0737 schedule, however, we found that it was impossible to meet the January 1, 1982 deadline. Parts and documentation necessary for a complete installation could not be obtained for an outage of sufficient duration prior to January 1, 1982. This was due to the limited number of suppliers, high demand, and long lead times for some of the necessary components.

b) Need

We hereby request an extension of the implementation schedule to the end of the refueling outage expected to begin in September 1982. All components and associated documentation are expected to be delivered before the beginning of that outage. Failure to receive an extension will result in a plant outage and lost generation for installation of components in areas inaccessible during operation upon receipt of those components.

c) Interim Compensatory Measures

Drywell pressure is currently indicated on a recorder with a range of -5 to +80 psig which serves as an interim monitoring device.

Attachment to June 7, 1982 letter

ENCLOSURE 2

SCHEDULE EXPLANATION (Continued)

II.K.3.22 RCIC Suction Modification

Unit 1:

Scheduled Completion Date: End of refueling outage following cycle 6,
currently scheduled for Spring, 1984

a) Justification

NUREG-0737 Item II.K.3.22 required that the switchover of reactor core isolation cooling (RCIC) from the condensate storage tank to the suppression pool be made automatic by January 1, 1982. Implementation of that modification requires the use of certain qualified level detection switches. The delivery of these switches is not anticipated until the spring of 1983.

b) Need

We hereby request an extension of the implementation deadline to the end of the refueling outage expected to begin in February 1984. All components and associated documentation are expected to be delivered by June 1983. Failure to receive such an extension may require a plant outage upon receipt of parts resulting in lost generation during the installation of components in areas inaccessible during normal operation. Provisions for installation of equipment in normally inaccessible areas will be made during the upcoming Unit 1 refueling outage in the fall of 1982 to the extent allowed by available parts. Installation will be completed no later than the end of the refueling outage following cycle 6, currently scheduled for the spring 1984.

c) Interim Compensatory Measures

Procedures exist for the manual transfer of RCIC suction as noted in our December 31, 1980 letter. Therefore, we believe that no significant risk to the public is created by this requested extension.

Unit 2:

Scheduled Completion Date: End of refueling outage following cycle 4,
currently scheduled for Spring, 1984

a) Justification

See Unit 1 discussion.

Attachment to June 7, 1982 letter

ENCLOSURE 2

SCHEDULE EXPLANATION (Continued)

b) Need

We hereby request an extension of the implementation deadline to December 31, 1983. All components and associated documentation is expected to be delivered by June 1983. Installation of equipment in normally inaccessible areas was made during the recent Unit 2 outage to the extent allowed by available parts. Installation will be made 60 days after all parts are available on site.

c) Interim Compensatory Measures

See Unit 1 discussion.