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Senior Vice President  
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the southern electric system  
NED-83-595

December 20, 1983

Director of Nuclear Reactor Regulation  
Attention: Mr. John F. Stolz, Chief  
Operating Reactors Branch No. 4  
Division of Licensing  
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  
CLARIFICATION OF ORGANIZATIONAL CHANGES

Gentlemen:

Pursuant to 10 CFR 50.90, as required by 10 CFR 50.59(c)(1), Georgia Power Company (GPC) hereby proposes changes to Appendices A (Technical Specifications) and B (Environmental Technical Specifications) to Operating Licenses DPR-57 and NPF-5 to clarify previous submittals. For simplicity and completeness, GPC has combined the previous submittals into one package of proposed changed pages for administrative changes in the Technical Specifications and the Environmental Technical Specifications (ETS). The proposed changes update our submittals of: June 11, 1982 (changes in shift manning to meet NUREG 0737 levels), July 9, 1982 (organizational changes), October 15, 1982 (corrected errors in the shift manning submittal), March 31, 1983 (changes audit requirements of Emergency and Security Plans), April 22, 1983 (TMI Action Plan Items), October 6, 1983 (Radiological Effluent Technical Specifications), October 24, 1983 (organizational changes), and October 27, 1983 (mechanical snubbers).

The pages for the Radiological Effluent Technical Specifications (RETS) submittal (Attachment 5) assume the approval of all proposed changes to the Technical Specifications and ETS in Attachments 2 thru 4. The proposed changes for RETS (Attachment 5) also reflect the organizational changes. Since there is a shift in philosophy between the bases of the current Technical Specifications and RETS, the changed pages for RETS are not, and should not be, identical to those in Attachments 2 thru 4. It was GPC's intention in the RETS submittal to incorporate all outstanding administrative changes. This was not done. It should be noted that the RETS submittal used a common administrative section for both Units. Therefore, there is only one set of insertion instructions for Appendix A Technical Specifications for RETS. Since this submittal is a revision to previous submittals, there is no fee remittance required.

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The proposed changes to the Technical Specifications are administrative in nature. The changes are briefly summarized below. For further details see the original submittal packages.

1. In all Attachments, changes to the onsite organization are reflected in revised Figure 6.2.2-1 of the Technical Specifications. There have been changes of titles throughout the organization and the respective Specifications have been revised to reflect the new titles. One of the sources of confusion, which we are attempting to rectify by this submittal, is due to inconsistencies between the October 6, 1983, and the October 24, 1983, submittals.
2. In all Attachments, offsite promotions, new positions, and title changes have made necessary additional changes to the Technical Specifications to reflect the organization which exists. These include: Executive Vice President-Power Supply, Manager-Nuclear Engineering and Chief Nuclear Engineer, and General Manager QA and Radiological Health and Safety. As before, the October 6, 1983, and the October 24, 1983, submittals did not consistently change all of the titles to their respective new designation.
3. In Attachment 5, addition of administrative limits on overtime as required by NUREG 0737 was not included in the RETS Submittal.
4. In Attachment 5, changes in shift manning levels, as required by NUREG 0737, were not included in the RETS Submittal.
5. In Attachment 5, changes in the audit requirements of the Emergency Plan and Security Plan were not totally incorporated. The change in frequency was included in the RETS submittal but not the restrictions on personnel.
6. Change, for RETS only, the audit frequency of the Operational Quality Assurance Program to the frequency specified in existing Technical Specifications. Through an administrative error the frequency was incorrectly listed as annually in the October 6, 1983 submittal.
7. In Attachment 5, requirements for documentation of challenges to, and failure or malfunction of safety/relief valves were not included in the RETS Submittal.
8. In Attachment 5, changes in the documentation requirement for Type B and Type C Leakage Tests were not included in the RETS Submittal.

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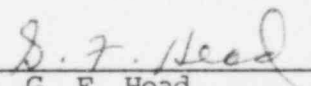
9. In Attachment 5, requirements on the service life of hydraulic and mechanical snubbers were not included in the RETS Submittal.
10. In Attachments 2 and 3, the effective dates of the NPDES Permit were not included in the October 24, 1983 submittal.
11. In Attachments 4 and 5, correct one typographical error, "or" to "of", in the Environmental Technical Specifications Section 5.5.2 of RETS and Section 5.6.2 of the existing ETS. These are the same specification, but have different section numbers due to the deletions made necessary by the moving of a large portion of ETS to Appendix 'A' in the RETS package.

The Plant Review Board and Safety Review Board have reviewed the proposed changes and determined, pursuant to 10 CFR 50.59, that they do not constitute an unreviewed safety question. All changes are administrative in nature. No plant systems are affected. Neither the probability of, nor the consequences of, analyzed accidents is affected. No new types of accidents are created. Margins of safety are unaffected. The intent of the revised organization is to strengthen management through the formation of new positions for well qualified personnel. The changes are expected to result in an overall increase in plant safety through greater management attention. The changes in reporting requirements are expected to increase attention to safety by all personnel.

Pursuant to the requirements of 10 CFR 50.92, J. L. Ledbetter of the Georgia Department of Natural Resources will be sent a copy of this letter and all applicable attachments. The Significant Hazards analysis for the proposed changes is included as Attachment 1 to this letter.

G. F. Head 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:   
G. F. Head

Sworn to and subscribed before me this 20th day of December, 1983.

  
Notary Public

Notary Public, Georgia, State at Large  
My Commission Expires July 26, 1985

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Enclosures: 1. Determination of No Significant Hazards  
2. Instructions for Incorporation, Unit 1 Appendix A  
3. Instructions for Incorporation, Unit 2 Appendix A  
4. Instructions for Incorporation, Units 1 and 2 Appendix B  
5. Instructions for Incorporation, Radiological Effluent  
Technical Specifications (RETS), Units 1 and 2

xc: H. C. Nix, Jr.  
Senior Resident Inspector, Plant Hatch  
J. P. O'Reilly, (NRC-Region II)  
J. L. Ledbetter (DNR)

ATTACHMENT 1  
NRC DOCKETS 50-321, 50-366  
OPERATING LICENSES DPR-57, NPF-5  
EDWIN I. HATCH NUCLEAR PLANT UNITS 1 AND 2  
PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

Pursuant to the standards of 10 CFR 50.92, Georgia Power Company has evaluated the proposed changes and determined that no significant hazards are involved. This change is administrative in nature and has no effect on accident probabilities or consequences. No new types of accidents are created. The margin of safety is unaffected.

Each of the requested changes is consistent with item (i) of "Examples of amendments that are considered not likely to involve significant hazards considerations" as published in the Federal Register, April 6, 1983, page 14870, as each change is administrative in nature.