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J. T. Beckham, Jr.
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NED-84-518

October 2, 1984

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
INTERIM COMPENSATION FOR SCHEDULER EXTENSION
FOR NON-OUTAGE RELATED APPENDIX R MODIFICATIONS

Gentlemen:

In a letter dated September 4, 1984 (NED-84-444), Georgia Power Company (GPC) proposed specific compensatory measures to support our request for scheduler relief from the requirements of 10 CFR 50.48 for non-outage related 10 CFR 50 Appendix R modifications. The NRC staff stated in telephone conversations with representatives of GPC on September 19, 1984 and September 24, 1984 that the proposed mitigation was insufficient to support the requested relief in four areas. Those areas as referenced in Enclosure 1 to our September 4, 1984 letter were:

- o Unit 1 Reactor Building North of Column Line R7 - Paragraph 4.1.5
- o Unit 2 Control Building Health Physics Area - Paragraph 4.2.2
- o Unit 2 Reactor Building North of Column Line R19 - Paragraph 4.2.6
- o Control Building Common Corridor - Paragraph 4.3.2

In the referenced telephone conversations, the NRC staff indicated that a roving fire watch in conjunction with other elements of mitigation cited in our September 4, 1984 letter would likely provide adequate compensation

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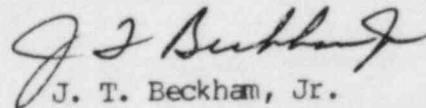
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and allow approval of the requested schedule extension. Pursuant to the resolution of our outstanding request prior to October 15, 1984, GPC hereby proposes the establishment of a roving fire watch whose patrol path will pass through the four areas in question at least once every thirty minutes. This frequency must be considered with recognition of other points of mitigation of fire hazards noted in our September 4, 1984 letter and described in our "Response to 10 CFR 50.48 and Appendix R" as amended through December 20, 1983. Cited therein are factors such as routine security patrols through the areas at a frequency of once every two hours, Plant Equipment Operators' tours at a minimum frequency of once per shift as well as their passing through the areas in conjunction with their duties, installed fire detection systems on the 130' level of both reactor buildings as well as the health physics area and the common corridor, moderate to low combustible fire loadings, and the relatively low risk of fire. To increase the inspection frequency significantly (to a period of fifteen minutes for example) beyond that proposed herein would result in doubling the resource expenditure and the man-rem exposure.

GPC makes this proposal while maintaining both our belief that existing fire protection measures are adequate and our concern regarding unnecessary radiation exposure to personnel. We, therefore, reserve an option to present alternate proposals of mitigation for your consideration at a future date. Time constraints of 10 CFR 50.48 prevent further discussion of this point.

Your earliest response to this proposal and our request for scheduler exemption is requested in light of the October 15, 1984 constraint imposed by 10 CFR 50.48. Thank you for your ongoing consideration of our requests concerning 10 CFR 50 Appendix R and its implementation.

Yours very truly,


J. T. Beckham, Jr.

WEB/mb

xc: L. T. Guwa
H. C. Nix, Jr.
J. P. O'Reilly (NRC- Region II)
Senior Resident Inspector