

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

Mailing Address:  
Post Office Box 4545  
Atlanta, Georgia 30302

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



*the southern electric system*

NED-84-307

August 1, 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  
RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS SUBMITTAL

Gentlemen:

In accordance with the provisions of 10 CFR 50.90 as required by 10 CFR 50.59(c) (1), Georgia Power Company (GPC) hereby proposes a complete revision to our submittal of October 6, 1983, as amended. This submittal is an amendment to the Edwin I. Hatch Nuclear Plant Units 1 and 2 Technical Specifications (Appendices A and B to the Operating Licenses) as described in the attachments to this letter. This application would amend the Technical Specifications by transferring the Radiological Effluents Technical Specifications (RETS) from Appendix B to Appendix A.

Both units were licensed with RETS based on activity and concentration limitations on plant effluents. Subsequent revisions to regulatory philosophy, notably 10 CFR 50 Appendix I, now base the design objectives for effluent control on radiation dose criteria as set forth in NUREG-0473 (Standard Radiological Effluent Technical Specifications for BWRs). The changes submitted herein are updates to our previous submittal and are mostly editorial, administrative, or the results of comments from the NRC staff (Effluent Treatment Systems Branch, Radiological Assessment Branch, and Operating Reactors Branch #4). These changes have been discussed with members of the NRC staff. As with previous RETS submittals, this package incorporates outstanding Proposed Technical Specifications, particularly in the Administrative Section, as if they had been approved by the Commission as tendered. The Offsite Dose Calculation Manual (ODCM) and the Process Control Program (PCP) are in the final review process. They will be sent to the NRC, for the NRC Staff's review, by October 1, 1984. It is our intention to implement RETS, the ODCM and the PCP January 1, 1985.

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Director of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
August 1, 1984  
Page Two

The Plant Review Board and the Safety Review Board have reviewed the proposed changes and have determined that they do not constitute an unreviewed safety question. These changes do not increase the probability or consequences of accidents or malfunctions of equipment previously analyzed because the accident analysis in the FSAR is based on the dose based limits proposed by this amendment. Also, no equipment modification nor design change to equipment is required to implement these changes. Consequently, these changes do not create new modes of operation nor potential for new accidents. These changes do not significantly decrease the margin of safety as described in the basis for Technical Specifications because this change implements NUREG 0473 which provides for a change in the method for compliance with effluent release dose rate and concentration limits as stated in 10 CFR 20. Further, cumulative doses will be limited in accordance with Appendix I to 10 CFR 50.

The proposed amendment, taken as a whole, constitutes a change to make the license conform to changes in the regulations (10 CFR 50 Appendix I). The license change results in very minor changes to facility operations necessary in order to implement the regulations. Therefore, the results of this change are consistent with Item (vii) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.

Attachments 1, 2, and 3 are respectively the insertion instructions and proposed amendment pages for Unit 1 Technical Specifications, Unit 2 Technical Specifications and Environmental Technical Specifications. We would be pleased to meet with you to discuss any questions which you might have at any time during your review of this submittal at our mutual convenience. If you have further questions, please contact this office.

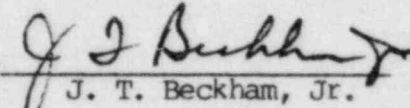
Pursuant to the requirements of 10 CFR 50.91, Mr. J. L. Ledbetter of the Environmental Protection Division of the Georgia Department of Natural Resources will be sent a copy of this letter and all applicable attachments.

Georgia Power 

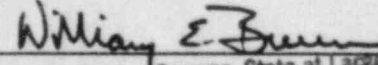
Director of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
August 1, 1984  
Page Three

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 1st day of August, 1984.

  
Notary Public, Georgia, State at Large  
My Commission Expires Aug. 26, 1986  
Notary Public  
MJB

Enclosures

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