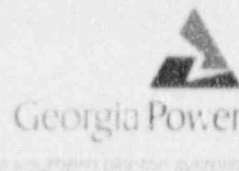


Georgia Power Company
40 Inverness Center Parkway
Post Office Box 12795
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Telephone 205 877-1279

J. T. Beckham, Jr.
Vice President—Nuclear
Hatch Project



HL-2014
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April 1, 1992

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST FOR RELIEF FROM
10 CFR 20.103(c)(2) REQUIREMENT

Gentlemen:

Title 10 Code of Federal Regulations Part 20.103, paragraph (c)(2) states: "The licensee maintains and implements a respiratory protection program that includes, as a minimum: ...and determination by a physician prior to initial use of respirators, and at least every 12 months thereafter, that the individual user is physically able to use the respiratory protective equipment." With the transmittal of this letter, Georgia Power Company (GPC) requests relief from the requirement that users of respirators be physically examined at least every 12 months. GPC requests the examination interval be changed to every 9 to 15 months.

The enclosure to this letter contains the bases for GPC's request and the determination the proposed change does not involve a safety hazards consideration.

If you have any questions or concerns, please notify this office any time. Your prompt attention in this matter would be appreciated.

Sincerely,

W. S. Beckham, Jr.
J. T. Beckham, Jr.

OCV/sd

cc: (See next page.)

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U.S. Nuclear Regulatory Commission
April 1, 1992
Page Two

cc: Georgia Power Company
Mr. H. L. Sumner, General Manager - Nuclear Plant
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. K. Jabbour, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebner, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

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ENCLOSURE

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-E7, NPF-5
BASES FOR REQUEST FOR RELIEF FROM
10 CFR 20.103(c)(2) REQUIREMENT

At Plant Hatch, individuals are presently scheduled for annual respirator physical examinations once every 12 months. The examinations are staggered, according to the date each individual received his/her last exam. Thus, physicals are scheduled on a year-round basis. Due to the large number of personnel requiring examination, ensuring each individual meets the requirements of 10 CFR 20.103(c)(2) presents a significant scheduling problem. In addition, a heavy burden is placed on the Health Physics Department during outages and periods when large numbers of contract personnel are being processed into the plant. Contract personnel must also be physically examined prior to respirator use.

To alleviate the continual scheduling problem, some permanent plant personnel are assigned early examination dates so contract personnel can be accommodated. This scheduling practice results in: 1) some permanent employees receiving more than one physical exam per year and 2) an increased administrative/tracking burden since subsequent examinations must be rescheduled. Therefore, GPC requests approval to administer physical examinations for the use of respirators every 9 to 15 months, rather than every 12 months as required by the Code. Changing the required interval between physical examinations from "at least every 12 months" to "every 9 to 15 months" will allow the Health Physics staff to adjust the schedule during less active periods without rescheduling subsequent exams.

GPC's determination the relief request does not involve a safety hazards consideration is based on the following:

1. The proposed change does not affect the design or operation of any plant system or component. No accident analysis is changed. Therefore, approval of the request will not result in an increased probability of occurrence or an increase in the consequences of any type of accident.
2. The proposed change does not significantly reduce the margin of safety. Personnel required to wear respirators will continue to receive periodic physical examinations to ensure the ability to use a respirator without adverse consequences to their health. All other requirements of the Plant Hatch respiratory protection program; i.e., procedural controls, use and type of sampling equipment, the bioassay program, and training of personnel, will remain unchanged. Thus, implementation of the proposed requirement will not adversely affect individual health and welfare.
3. The proposed change does not involve the handling of any radiological effluents; therefore, no adverse environmental consequences will result from implementation of the proposed requirement.