

December 3, 1992

Docket Nos. 50-424  
and 50-425

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Mr. W. G Hairston, III  
Senior Vice President -  
Nuclear Operations  
Georgia Power Company  
P. O. Box 1295  
Birmingham, Alabama 35201

Dear Mr. Hairston:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING NEW 10 CFR PART 20,  
VOGTLE NUCLEAR GENERATING PLANT, UNITS 1 AND 2  
(TAC NOS. M84529 AND M84530)

The NRC staff is reviewing your application of September 17, 1992, for license amendments to change the Vogtle Technical Specifications to implement revisions to 10 CFR Part 20 as published in the Federal Register (56 FR 23360, dated May 21, 1991). We find that the additional information and changes identified in the enclosure are needed for completion of this review.

Your written response to the enclosure is requested within 45 days of receipt of this letter. If you have questions regarding the enclosure or are unable to meet the requested response date, contact me at (301) 504-3049.

This requirement affects fewer than ten respondents, and therefore, is not subject to Office of Management and Budget review under P.L. 96-511.

Sincerely,

/s/

Darl S. Hood, Sr. Project Manager  
Project Directorate II-3  
Division of Reactor Projects - 1/11  
Office of Nuclear Reactor Regulation

Enclosure:  
Request for Additional  
Information

cc w/enclosure: See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

December 3, 1992

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and 50-425 -

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Senior Vice President -  
Nuclear Operations  
Georgia Power Company  
P. O. Box 1295  
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Sincerely,

A handwritten signature in dark ink that reads "Darl S. Hood".

Darl S. Hood, Sr. Project Manager  
Project Directorate II-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosure:  
Request for Additional  
Information

cc w/enclosure:  
See next page

Mr. W. G. Hairston, III  
Georgia Power Company

Vogtle Electric Generating Plant

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NRC STAFF POSITIONS AND REQUEST FOR ADDITIONAL INFORMATION  
ON PROPOSED TECHNICAL SPECIFICATION CHANGES  
TO INCORPORATE THE NEW 10 CFR PART 20 FOR  
VOGTLE ELECTRIC GENERATING PLANT UNITS 1 AND 2

- 470.1 Your proposed definition of MEMBER OF THE PUBLIC should retain the last sentence of the original Technical Specification (TS). Also, it should state, "This category may include persons who use portions of the site for recreational, occupational, or other purposes not associated with the plant."
- 470.2 Your proposed definition of UNRESTRICTED AREA should retain the last part of the original TS wording in the last sentence that reads, "... or any area within the SITE BOUNDARY used for residential quarters or for industrial, commercial, institutional, and/or recreational purposes."
- 470.3 In Bases 3/4.11.1.4, "Liquid Holdup Tanks", you propose to replace "10 CFR Part 20, Appendix B, Table II, Column 2" with "10 CFR Part 20.1302(b)(2)(i)."

NUREG-0133 and Standard Review Plan 15.7.3 provide guidance in this area. These documents state that radioactivity must be controlled so that leaked fluid does not result in concentrations to a water supply in an unrestricted area in excess of the limits of 10 CFR Part 20, Appendix B, Table II, Column 2. This is the instantaneous concentration given in the table. It is not the annual average of the concentration, as would be allowed if the proposed section of the rule (20.1302) were substituted. Your proposed use of 10 CFR 20.1302(b)(2)(i) in the Bases would imply that annual averaging of the effluent concentration is allowed. This would be incorrect as annual averaging is not allowed for this specification.

Because the new values in Appendix B, Table II, Column 2 to 10 CFR 20.1001-20.2401 are, overall, a factor of 10 lower than before, the NRC staff considers it acceptable for licensees to propose increasing these values by a factor of 10. These values will maintain the same overall level of effluent control that existed under the old Part 20. The 10 curie limit remains unchanged.

The NRC staff's position is that the Bases should be revised to reference a value of 10 times the limits of Appendix B, Table II, Column 2 to 10 CFR 20.1001-20.2401. Alternatively, provide further justification for your proposed change.

- 470.4 In the proposed "Insert 2" to the Administrative Controls, Section f, Radioactive Effluent Controls Program, you use the phrase "which corresponds to a dose rate of 500 mrem/year total effective dose equivalent." The NRC staff finds this phrase to be unnecessary, inconsistent with the Standard Technical Specification, and to provide no additional control in the context of the purpose of the TS. Therefore, it should be deleted.

The intent of the TS is to limit the concentrations of radioactive material in gases released to areas beyond the site boundary. The NRC staff finds that including words for purposes other than controlling radioactive gaseous effluent is inappropriate. If you deem clarification for other purposes necessary, such clarification should be placed in appropriate license documents, not in the TS.

Alternatively, provide further justification for your proposed basis.

- 470.5 In Administrative Controls, Section 6.11, High Radiation Area, your TS should be revised to use 20.1601(a) as the appropriate update for 20.203(c). Also, you should acknowledge that in 10 CFR 20.1601(a), there are three controls listed; a "control device", an "alarm signal", and "entryways that are locked." The NRC staff's position is that your proposed TS should include this requirement.
- 470.6 In Administrative Controls, Section 6.11.2, High Radiation Area, the dose rate values should be revised to specify a range. This will distinguish the controls needed for a High Radiation Area from those for a Very High Radiation Area. The TS should be revised to specify a range of greater than 1000 mrem in 1 hour but less than 500 rads (5 grays) in 1 hour.
- 470.7 10 CFR 20.1602, Control of Access to Very High Radiation Areas, requires that measures in addition to those of 10 CFR 20.1601 be taken to prevent unauthorized or inadvertent access to areas in which radiation levels could be encountered at 500 rads (5 grays) or more in 1 hour at 1 meter from a radiation source or any surface through which the radiation penetrates.

Propose a new TS specifying the measures to be taken to control access to Very High Radiation Areas. For example, one such measure might be based upon a separate plant procedure, approved by the plant operations review committee, which establishes the control requirements for Very High Radiation Areas.