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Vice President, Nuclear
Vogtle Project



December 7, 1992

Docket Nos. 50-424
50-425

ELV-04086

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

Gentlemen:

**VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT**

By letter dated March 4, 1992, Georgia Power Company submitted a response to Generic Letter 89-01 regarding Radiological Effluent Technical Specification (RETS) changes. Included with the response were proposed changes to the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications Administrative Controls section associated with the Semiannual Radioactive Effluent Release Report. The proposed technical specification changes were made consistent with the recommendations contained in Generic Letter 89-01. Since that time, the Nuclear Regulatory Commission (NRC) amended their regulations as noticed in 57 FR 39353 dated August 31, 1992. Specifically, 10 CFR 50.36a, regarding technical specifications on effluents from nuclear power reactors, was one of the regulations revised whereby the frequency of reporting the quantity of each of the principal radionuclides released to unrestricted areas in liquid and in gaseous effluents was changed from semiannual to annual. Such reporting at VEGP is currently made on a semiannual basis in the Semiannual Radioactive Effluent Release Report.

In accordance with the new 10 CFR 50.36a, Georgia Power Company has prepared proposed changes to the VEGP Unit 1 and Unit 2 Technical Specifications to incorporate the requirements for an Annual Radioactive Effluent Release Report in lieu of the current semiannual report. The proposed changes and bases for the changes are described in enclosure 1 to this letter. Enclosure 2 provides an evaluation pursuant to 10 CFR 50.92 showing that the proposed changes do not involve significant hazards considerations. A copy of the proposed changes is provided in enclosure 3. The proposed change pages that were included in Georgia Power Company's response to Generic Letter 89-01 were

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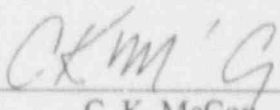
utilized in the preparation of the proposed changes. In addition, the proposed changes associated with the new 10 CFR 50.36a reporting requirements have been "clouded" to distinguish them from the Generic Letter 89-01 changes.

Georgia Power Company requests that these proposed changes be approved coincident with the Generic Letter 89-01 proposed technical specification changes. However, if unforeseen circumstances cause any significant delays it is requested that the proposed changes associated with the new 10 CFR 50.36a be approved no later than February 28, 1993, since the next Semiannual Radioactive Effluent Release Report must be submitted within 60 days after January 1, 1993. Accordingly, as discussed in enclosure 1, the Annual Radioactive Effluent Release Report will be submitted prior to May 1 of each year, beginning in 1993. Therefore, the time between submission of the last Semiannual Radioactive Effluent Release Report (August 27, 1992) and the first Annual Radioactive Effluent Release Report and each subsequent annual report thereafter will not exceed 12 months as required by the new 10 CFR 50.36a.

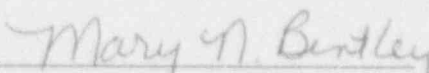
In accordance with 10 CFR 50.91, the designated state official will be sent a copy of this letter and all enclosures.

Mr. C. K. McCoy states that he is a 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 and enclosures are true.

GEORGIA POWER COMPANY

By: 
C. K. McCoy

Sworn to and subscribed before me this 17th day of December, 1992


Notary Public

MY COMMISSION EXPIRES 11/1/93

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CKM/TMM

Enclosures:

1. Basis for Proposed Change
2. 10 CFR 50.92 Evaluation
3. Proposed Technical Specification Changes

c(w): Georgia Power Company
Mr. W. B. Shipman
Mr. M. Sheibani
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebnetter, Regional Administrator
Mr. D. S. Hood, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

State of Georgia
Mr. J. D. Tanner, Commissioner, Department of Natural Resources

ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

BASIS FOR PROPOSED CHANGE

ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

BASIS FOR PROPOSED CHANGE

Proposed Change 1

Revise proposed Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specification 1.19 submitted by Georgia Power Company Letter dated March 4, 1992, in response to Generic Letter 89-01, in order to change the frequency of submittal of the Semiannual Radioactive Effluent Release Report to an annual basis.

Basis

Proposed VEGP Unit 1 and Unit 2 Technical Specification 1.19 submitted by Georgia Power Company letter dated March 4, 1992, revised the definition of the Offsite Dose Calculation Manual in accordance with the requirements of Generic Letter 89-01. Contained in that definition was a reference to the Semiannual Radioactive Effluent Release Report. Therefore, it is proposed that the definition be revised to change the reference to the Annual Radioactive Effluent Release Report in order to implement the new 10 CFR 50.36a reporting requirements.

This proposed change is administrative in nature in order to reduce an unnecessary burden of governmental regulation. This change will in no way reduce the protection for the public health and safety.

Proposed Change 2

Revise proposed VEGP Unit 1 and Unit 2 Technical Specification 6.8.1.4 submitted by Georgia Power Company Letter dated March 4, 1992, in response to Generic Letter 89-01, and its index reference, in order to change the frequency of submittal of the Semiannual Radioactive Effluent Release Report to an annual basis. Also proposed is a change to the submittal date of the report from within 60 days after January 1 and July 1 of each year, to prior to May 1 of each year.

ENCLOSURE 1 (CONTINUED)

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

BASIS FOR PROPOSED CHANGE

Basis

Proposed Technical Specification 6.8.1.4 submitted by Georgia Power Company letter dated March 4, 1992, contained the Generic Letter 89-01 requirement for submitting a Semiannual Radioactive Effluent Release Report within 60 days after January 1 and July 1 of each year. In accordance with the requirements of the new 10 CFR 50.36a, Georgia Power Company proposes to change the frequency of submittal of the report to an annual basis thereby becoming the Annual Radioactive Effluent Release Report. The corresponding index reference to the Semiannual Radioactive Effluent Release Report has also been revised.

Although a schedule for submittal of an annual report is not stipulated in the new 10 CFR 50.36a, it is proposed that the schedule be revised such that the report is submitted prior to May 1 of each year. This change would then be consistent with the prior to May 1 reporting requirement for the Annual Radiological Environmental Surveillance Report which is currently contained in VEGP Unit 1 and Unit 2 Technical Specification 6.8.1.3 and proposed VEGP Unit 1 and Unit 2 Technical Specification 6.8.1.3 submitted in Georgia Power Company's response to Generic Letter 89-01 dated March 4, 1992.

VEGP Unit 1 and Unit 2 Technical Specification 6.8.1.4 also requires that the quantity of radioactive solid wastes released be reported in the Semiannual Radioactive Effluent Release Report. However, the reporting requirement associated with solid wastes is not addressed in either the old or new 10 CFR 50.36a. Therefore, to be consistent with the proposed reporting requirements for liquid and gaseous effluents it is proposed that the quantity of solid waste releases also be reported on an annual basis.

These proposed changes are administrative in nature in order to reduce an unnecessary burden of governmental regulation. This change will in no way reduce the protection for the public health and safety.

ENCLOSURE 1 (CONTINUED)

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

BASIS FOR PROPOSED CHANGE

Proposed Change 3

Revise proposed VEGP Unit 1 and Unit 2 Technical Specification 6.13.2.c submitted by Georgia Power Company letter dated March 4, 1992, in response to Generic Letter 89-01, in order to change the frequency of submittal of the Semiannual Radioactive Effluent Release Report to an annual basis.

Basis

Proposed VEGP Unit 1 and Unit 2 Technical Specification 6.13.2.c submitted by Georgia Power Company letter dated March 4, 1992, revised the Administrative Controls section requirements for the Offsite Dose Calculation Manual in accordance with the requirements of Generic Letter 89-01. Contained in the requirements was a reference to the Semiannual Radioactive Effluent Release Report. Therefore, it is proposed that the Administrative Controls section requirements be revised to change the reference to the Annual Radioactive Effluent Release Report in order to implement the new 10 CFR 50.36a reporting requirements.

This proposed change is administrative in nature in order to reduce an unnecessary burden of governmental regulation. This change will in no way reduce the protection for the public health and safety.

ENCLOSURE 2

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

10 CFR 50.92 EVALUATION

VOGTLE ELECTRIC GENERATING PLANT
SIGNIFICANT HAZARDS CONSIDERATION CHECKLIST
10 CFR 50.92

(1) UNIT NUMBER: ☐ ONE ☐ TWO ☒ SHARED

(2) CHECKLIST APPLICABLE TO: Technical Specification Change Associated With
the Semiannual Radioactive Effluent Release
Report

(3) EVALUATION - PART A

The following change to the Vogtle Electric Generating Plant License involves:

(3.1) Yes ☒ No ☐ A change to the Technical Specifications?

(3.2) Yes ☐ NO ☒ A change to a License Condition?

(3.3) Yes ☐ No ☒ Any other change to the License?

(4) SAFETY EVALUATION - PART B

Does the proposed license amendment to the Vogtle Electric Generating Plant License:

(4.1) Yes ☐ No ☒ Involve a significant increase in the probability or consequences of an accident previously evaluated?

(4.2) Yes ☐ No ☒ Create the possibility of a new or different kind of accident from any accident previously evaluated?

(4.3) Yes ☐ No ☒ Involve a significant reduction in a margin of safety?

If any answer to questions (4.1) through (4.3) is "Yes", a significant hazards consideration may be involved. A written basis for the answers provided to questions (4.1) through (4.3) must accompany this checklist.

(5) REMARKS: (Attach additional pages if necessary) _____

(10 CFR 50.92 Evaluation attached)

(6) PREPARER'S SIGNATURE: T. M. Milton DATE: 10/23/92

(7) REVIEWER'S SIGNATURE: _____ DATE: _____

(8) REVIEWER'S SIGNATURE: W. M. Hopper DATE: 10/26/92

(9) MANAGER'S SIGNATURE: Ben Hopper DATE: 10/26/92

ENCLOSURE 2

VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

10 CFR 50.92 EVALUATION

Pursuant to 10 CFR 50.92, Georgia Power Company has evaluated the proposed revisions to the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications and has determined that operation of the facility in accordance with the proposed amendment would not involve any significant hazards considerations.

Background

On August 31, 1992, the Nuclear Regulatory Commission (NRC) placed a notice in the Federal Register (57 FR 39353) regarding several amendments to their regulations. Specifically, 10 CFR 50.36a was one of the regulations revised whereby the frequency of reporting the quantity of each of the principal radionuclides released to unrestricted areas in liquid and in gaseous effluents was changed from semiannual to annual. Such action was taken by the NRC in response to a Presidential memorandum requesting that selected Federal agencies review and modify regulations that would eliminate any unnecessary burden of governmental regulation and insure that the regulated community is not subject to duplicative or inconsistent regulation.

The reporting of the quantity of effluent releases is currently performed at VEGP on a semiannual basis in accordance with the Semiannual Radioactive Effluent Release Report requirement contained in the Vogtle Unit 1 and Unit 2 Technical Specifications. That reporting requirement continued to be maintained in Georgia Power Company's response to Generic Letter 89-01 dated March 4, 1992. Therefore, in accordance with 57 FR 39353, Georgia Power Company proposes to satisfy the new 10 CFR 50.36a reporting requirement in an Annual Radioactive Effluent Release Report which will replace the current semiannual report.

The VEGP Unit 1 and Unit 2 Technical Specifications also require that the quantity of radioactive solid wastes released be reported in the Semiannual Radioactive Effluent Release Report. Although the reporting requirement associated with solid wastes is not addressed in either the old or new 10 CFR 50.36a, Georgia Power Company believes that the intent of the Presidential memorandum would be to allow for a change to the reporting requirement for solid wastes, similar to that being provided for liquid and gaseous effluents in order to more effectively reduce the burden of governmental regulation.

ENCLOSURE 2 (CONTINUED)

VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

10 CFR 50.92 EVALUATION

Analysis

The proposed changes to the technical specifications will allow for the implementation of the new 10 CFR 50.36a reporting requirement and fulfill the spirit of the Presidential memorandum. The proposed changes are administrative in nature and will not reduce the level of radiological control at VEGP. Compliance with applicable regulatory requirements governing radioactive effluents, radiological environmental monitoring, and solid wastes, including 10 CFR 20, Appendix I to 10 CFR 50, 10 CFR 61, 10 CFR 71, and 40 CFR 190, will continue to be maintained.

Conclusion

Based on the above considerations, Georgia Power Company has concluded the following concerning 10 CFR 50.92.

1. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes are administrative in nature and do not involve any change to the configuration or method of operation of any plant equipment that is used to mitigate the consequences of an accident. Also, the proposed changes do not alter the conditions or assumptions in any of the Final Safety Analysis Report (FSAR) accident analyses. Since the FSAR accident analyses remain bounding, the radiological consequences previously evaluated are not adversely affected by the proposed changes. Therefore, it can be concluded that the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.
2. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes are administrative in nature and do not involve any change to the configuration or method of operation of any plant equipment that is used to mitigate the consequences of an accident. Accordingly, no new failure modes have been defined for any plant system or component important to safety nor has any new limiting failure been

ENCLOSURE 2 (CONTINUED)

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10 CFR 50.92 EVALUATION

identified as a result of the proposed changes. Also, there will be no change in the types or increase in the amount of effluents released offsite. Therefore, it can be concluded that the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed changes do not involve a significant reduction in a margin of safety. The proposed changes are administrative in nature and do not adversely impact the plant's ability to meet applicable regulatory requirements related to liquid and gaseous effluents, and solid waste releases. The proposed changes would also eliminate an unnecessary burden of governmental regulation without reducing protection for public health and safety. Therefore, it can be concluded that the proposed changes do not involve a significant reduction in a margin of safety.

Based on the preceding information, it has been determined that the proposed Technical Specification changes do not involve a significant hazards consideration as defined by 10 CFR 50.92(c).