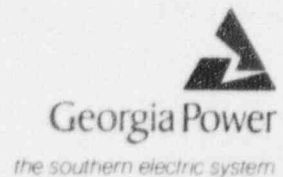


Georgia Power Company
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 877-7122

C. K. McCoy
Vice President, Nuclear
Vogtle Project



September 11, 1996

Docket Nos. 50-424
50-425

LCV-0606

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

VOGTLE ELECTRIC GENERATING PLANT
UPDATED DOCUMENTATION FOR LICENSE AMENDMENTS APPLICATION
SOUTHERN NUCLEAR TO BECOME THE LICENSED OPERATOR
NRC TAC Nos. M84531 and M84532

Gentlemen:

On September 18, 1992, Georgia Power Company (GPC) submitted an application to amend Facility Operating License (FOL) Nos. NPF-68 and NPF-81 which would authorize Southern Nuclear Operating Company, Inc. (Southern Nuclear) to become the licensed operator and have exclusive responsibility and control over the physical construction, operation, and maintenance of Vogtle Electric Generating Plant, Unit 1 and Unit 2 (VEGP). By letters to the NRC dated October 7, 1992 and October 15, 1992, GPC supplemented this application based on discussions with the NRC by submitting wording revisions to FOL Nos. NPF-68 and NPF-81 associated with antitrust license conditions and the latest revision dates of the Physical Security Plan, the Guard Training and Qualification Plan, and the Contingency Plan. In addition, GPC has notified the NRC of various personnel and organizational changes since the 1992 submittal. Furthermore, VEGP has been issued license amendments separate from the current amendment proceedings, such as for power uprate.

Georgia Power Company hereby provides conforming copies of enclosures to the September 18, 1992 submittal which incorporate the revisions discussed above as well as other changes since 1992 (e.g. Physical Security and Contingency Plan revisions). This submittal does not impact the significant hazards consideration evaluation provided in the September 18, 1992 submittal and published in the Federal Register on October 14, 1992. These updates have also been compared with the environmental assessment published in the Federal Register on November 3, 1992 and it is GPC's conclusion that no impact exists.

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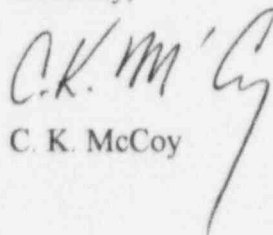
The attached conforming documents are provided simply to reflect changes that have occurred since the original application was made.

Associated pages from the application and the entire marked-up operating licenses in the September 18, 1992 submittal should be removed and replaced with the revised pages which are provided in the enclosure.

In accordance with 10 CFR 50.91, the designated State official will be sent a copy of this letter and its enclosure.

Georgia Power Company is requesting that the NRC complete their review and approval process of the referenced application, as updated by this submittal, as soon as practical. In addition to the NRC approval, other activities must be completed before Southern Nuclear is prepared to become the exclusive licensed operator of VEGP. Accordingly, GPC requests that these license amendments be made effective as of their date of issuance with the provision that the license conditions shall be implemented within 60 days of the date of issuance and upon the official transfer of responsibilities between GPC and Southern Nuclear. GPC will separately notify the NRC when all other requirements are satisfied and Southern Nuclear is ready to become the licensed operator of VEGP.

Sincerely,


C. K. McCoy

CKM/JDB

Enclosure

LCV-0606

U. S. Nuclear Regulatory Commission

Page Three

c(w): Georgia Power Company

Mr. H. A. Franklin

Mr. W. G. Hairston, III

Mr. J. D. Woodard

Mr. J. B. Beasley

Mr. M. Sheibani

NORMS

U. S. Nuclear Regulatory Commission

Mr. S. D. Ebnetter, Regional Administrator

Mr. L. L. Wheeler, Licensing Project Manager, NRR

Mr. C. R. Ogle, Senior Resident Inspector, Vogtle

State of Georgia

Mr. L. C. Barrett, Commissioner, Department of Natural Resources

Enclosure

**Updates to Application to Amend
Facility Operating License Nos. NPF-68 and NPF-81
dated 9/18/92**

**Updates to Attachment C "Changes to the Operating Licenses"
dated 9/18/92**

including updates to:

Description of Changes to the Operating Licenses
Operating Licenses

Technical Specifications (Appendix A to the Operating License)
Antitrust Conditions (Appendix C to the Operating License)

Updates to Application to Amend
Facility Operating License Nos. NPF-68 and NPF-81
dated 9/18/92

This section provides a general description of the changes to the license application. These updates reflect the organizational changes that have occurred since the original submittal dated September 18, 1992. [Reference: Georgia Power Company letters to the NRC (Docket Nos. 50-424 and 50-425) dated October 23, 1992, March 5, 1993, May 21, 1993, June 14, 1993, December 17, 1993 and July 27, 1995.]

1. Organizational changes were made on pages 6, 7, and 8. The changes accurately reflect the current officers and directors of Southern Nuclear. A new Assistant Secretary and Assistant Treasurer has been named recently.
2. A change was made to the proposed organizational chart on page 9. The Governmental Affairs position was replaced with the Executive Vice President and Corporate Counsel position. With this change, the Technical Services and Administrative Services Vice Presidents now report to this new position.
3. A change was made to the proposed organizational chart on page 9. Due to the Southern Company functionalization of some Human Resource duties, an additional Vice President - Human Resources position was added. This Vice President has additional reporting responsibilities to other Southern Company subsidiaries.
4. The Human Resources organization, which has been formed due to the Southern Company functionalization of some Human Resources duties, has been added to the appropriate section on pages 11 and 12 of the application. This update required an additional page - 12A.

INSTRUCTIONS FOR UPDATING DOCUMENT

Replace Page 6
Replace Page 7
Replace Page 8
Replace Page 9
Replace Page 11
Replace Page 12
Add Page 12A

to engage in the business of operation of nuclear power plants, to provide associated technical and administrative services, and to provide support services in connection with such operations. Currently, Southern Nuclear provides nuclear support services to Georgia Power Company and is the licensed operator for Alabama Power Company's Joseph M. Farley Nuclear Plant, Units 1 and 2. Upon the effective date of the requested amendments, Southern Nuclear will be authorized to possess, manage, use, operate and maintain VEGP Units 1 and 2. Georgia Power Company, concurrent with this application, has also filed a separate application with the NRC for Southern Nuclear to operate the Edwin I. Hatch Nuclear Plant, Units 1 and 2.

D. Organization and Management of Operating Corporation

Southern Nuclear is a corporation organized and existing under the laws of the State of Delaware. Its principal office is located near Birmingham, Alabama. Southern Nuclear is neither owned, controlled nor dominated by an alien or foreign corporation or a foreign government.

All directors and officers of Southern Nuclear are citizens of the United States. Their names and addresses are provided as follows:

Directors

Name

Mailing Address

A. W. Dahlberg

270 Peachtree Street NW
Atlanta, Georgia 30303

| | |
|---------------------|--|
| P. J. DeNicola | 64A Perimeter Center East Atlanta, Georgia 30346 |
| W. G. Hairston, III | Post Office Box 1295 Birmingham, Alabama 35201-1295 |
| E. B. Harris | 600 North 18th Street Birmingham, Alabama 35291 |
| H. A. Franklin | 333 Piedmont Avenue Atlanta, Georgia 30308 |

Officers

| | |
|--|--|
| W. G. Hairston, III ¹ President and CEO | Post Office Box 1295 Birmingham, Alabama 35201-1295 |
| J. D. Woodard ² Executive Vice President | Post Office 1295 Birmingham, Alabama 35201-1295 |
| J. H. Miller, III Executive Vice President and Corporate Counsel | Post Office 1295 Birmingham, Alabama 35201-1295 |
| J. W. Averett Vice President | Post Office Box 1295 Birmingham, Alabama 35201-1295 |
| L. B. Long Vice President | Post Office Box 1295 Birmingham, Alabama 35201-1295 |
| D. N. Morey Vice President | Post Office Box 1295 Birmingham, Alabama 35201-1295 |
| J. T. Beckham, Jr. ³ Vice President | Post Office Box 1295 Birmingham, Alabama 35201-1295 |
| C. K. McCoy ⁴ Vice President | Post Office Box 1295 Birmingham, Alabama 35201-1295 |
| C. A. Martin ⁵ Vice President-Human Resources | 270 Peachtree Street NW Atlanta, GA 30303 |

¹ Mr. Hairston is also currently an Executive Vice President of Georgia Power Company.

² Mr. Woodard is also currently a Senior Vice President of Georgia Power Company.

³ Mr. Beckham is also currently a Vice President of Georgia Power Company.

⁴ Mr. McCoy is also currently a Vice President of Georgia Power Company.

⁵ Mr. Martin is also currently a Vice President of The Southern Company as well as Vice President of other specific Southern electric system companies (i.e., Alabama Power Company, Georgia Power Company, Southern Company Services, Savannah Electric and Power Company, Gulf Power Company, and Mississippi Power Company).

J. O. Meier
Vice President and Secretary

Post Office Box 1295
Birmingham, Alabama 35201-1295

R. M. Gilbert, Jr.
Comptroller and Treasurer

Post Office Box 1295
Birmingham, Alabama 35201-1295

W. E. Boston
Assistant Secretary and
Assistant Treasurer

64A Perimeter Center East
Atlanta, Georgia 30346

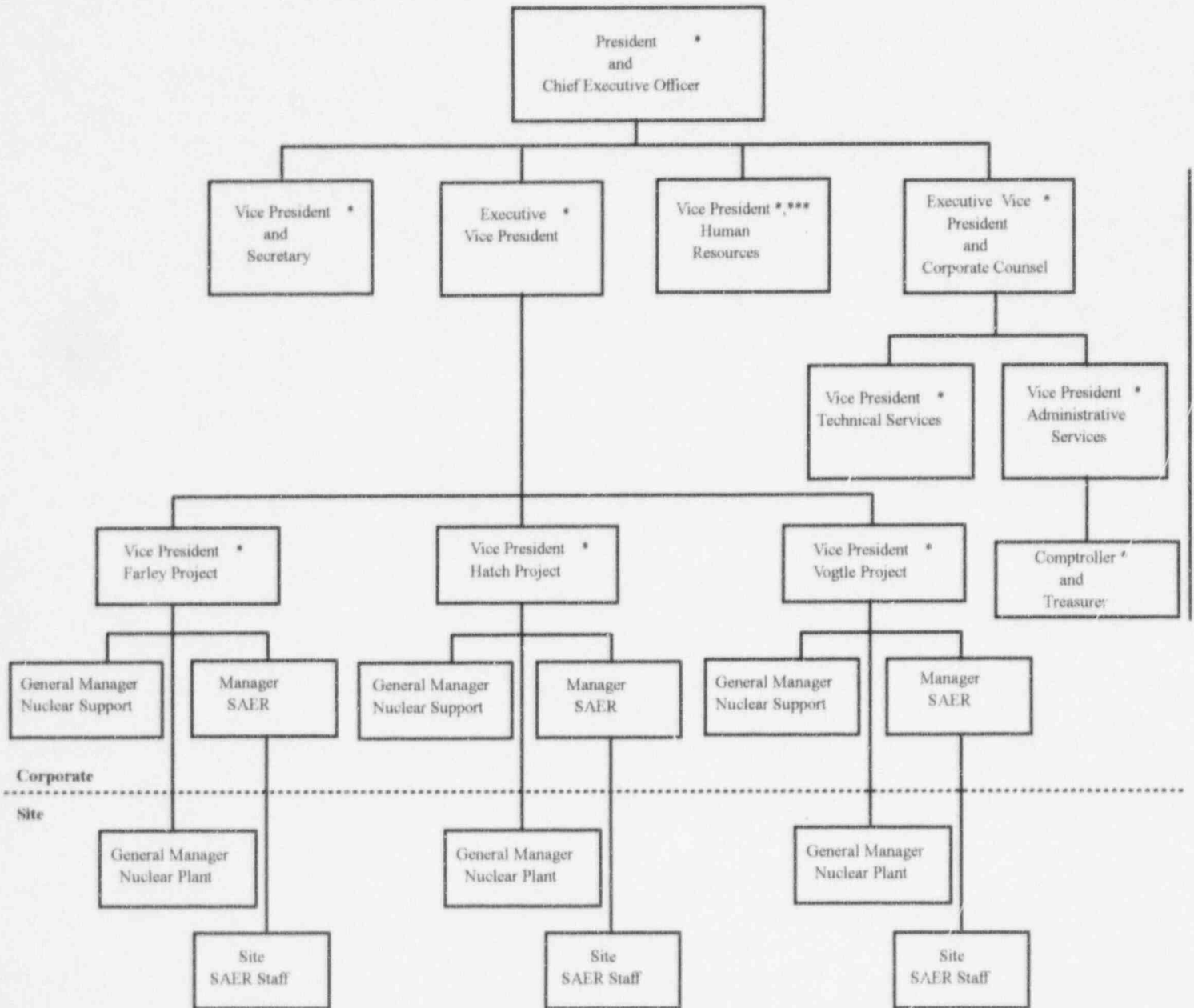
S. A. Mitchell
Assistant Secretary and
Assistant Treasurer

Post Office Box 1295
Birmingham, Alabama 35201-1295

After the amendments become effective, Southern Nuclear will have three internal organizations dedicated to pursuing safe plant operations: Nuclear Operations, Technical Services, and Administrative Services. Each organization will ultimately report to the President and Chief Executive Officer. The VEGP Nuclear Operations organization will consist principally of the on-site personnel and some direct support personnel at corporate headquarters. Technical Services also will be located at corporate headquarters, and will consist of specialized, technical functions supporting VEGP and the other nuclear plants in the Southern electric system. Similarly, the Administrative Services organization will be at corporate headquarters and will provide administrative support for VEGP and other nuclear plants. The proposed organizational chart is provided on the following page. The technical qualifications of Southern Nuclear and a brief description of each organization is provided below:

Southern Nuclear Operating Company **

(Proposed; titles may vary)



* Southern Nuclear Officer

** Chart assumes that Southern Nuclear operates Edwin I. Hatch Plant also.

*** Also reports to The Southern Company President/CEO, and other specific Southern electric system CEOs (i.e., Alabama Power Company, Georgia Power Company, Southern Company Services, Savannah Electric and Power Company, Gulf Power Company, and Mississippi Power Company) relative to their respective company.

President, who reports to the Executive Vice President, who ultimately reports to the President and Chief Executive Officer. These are the officers responsible for the safe, reliable, and economic operation of VEGP. Several significant advantages result from the project concept:

- (1) It provides clear lines of authority and responsibility while ensuring that essential corporate support functions which are dedicated to the project report to a single responsible executive (i.e., the project Vice President).
- (2) The effectiveness of project quality assurance is enhanced by integration with other aspects of project management under the direction of a single executive (i.e., the project Vice President).
- (3) The project structure provides the project executive the flexibility necessary for managing his resources to achieve optimal results.
- (4) The project structure provides management of Southern Nuclear the flexibility necessary to adapt to different procedures and methods used at each nuclear plant within the Southern electric system.
- (5) The effectiveness of a dedicated corporate project support organization is enhanced by identification with and sharing of common goals and objectives.

(3) Technical Services and Administrative Services
and Human Resources

In addition to the project support group, there are Technical Services, Administrative Services and Human Resources organizations. The Technical Services organization provides support to the Nuclear Operations organization in areas such as in-service inspection, nuclear fuel management, regulatory support (e.g., probabilistic risk assessment, radiological safety and generic licensing), and corporate quality services. Technical Services currently provides technical support to VEGP, as well as to the Hatch and Farley facilities, in a resource-efficient manner. The Administrative Services organization currently

provides financial services and procurement services; handles certain personnel matters, certain labor relations, public affairs and corporate security; and performs other duties of an administrative nature. As with Technical Services, Administrative Services performs these duties for multiple nuclear plants in a resource-efficient manner. Both the Administrative Services Vice President and the Technical Services Vice President report to the Executive Vice President and Corporate Counsel, who ultimately reports to the President and Chief Executive Officer.

The Human Resources organization was formed in connection with the Southern Electric System-wide functionalization of services for specific human resources functions. The organization currently provides services related to employee compensation and benefits; leadership development, training and organizational effectiveness; and staffing. For services relative to Southern Nuclear, the Vice President - Human Resources reports to the President and Chief Executive Officer.

E. Organization of the VEGP Project

(1) On-Site Organization

After amendment of the facility operating licenses as requested in this application, no change in the VEGP on-site nuclear operation organization is anticipated except for the change of employer from Georgia Power Company to Southern Nuclear and, where appropriate, title changes reflecting the exclusive operating status of Southern Nuclear.

With respect to the regulations concerning unrestricted access authorization for nuclear personnel, existing Georgia Power Company

personnel who, under the provisions of 10 CFR 73.56(c)(1), were granted continued unescorted access authorization for VEGP will continue to have unescorted access authorization without further evaluation after Southern Nuclear becomes the exclusive licensed operator of VEGP. The intention is that these employees will retain their unescorted access to VEGP without further evaluation after they are reassigned to Southern Nuclear. For these employees, Southern Nuclear becoming the licensed operator will not change the character or location of their work or interrupt employment at the site, and therefore further evaluation is not considered necessary.

Updates to Attachment C "Changes to Operating Licenses"
dated 9/18/92

This section provides a general description of the changes to Attachment C in the 9/18/92 letter.

Description of Changes to the Operating Licenses

A new paragraph (No. 6) was added to the Operating Licenses section dealing with the consolidation of the physical security and contingency plans. This change is self-explanatory.

The original package defined licensee on page 1-4 of the Technical Specifications. Due to Amendments 66 and 45 for Unit 1 and Unit 2, respectively, the term licensee no longer appears on that page. The term licensee is now defined on page 1-6.

A new paragraph was added to the Antitrust Conditions section dealing with the October 7, 1992 revision. This paragraph is self-explanatory.

Operating Licenses

Since the 9/18/92 submittal, two license amendments have subsequently altered the operating licenses. Amendment 81 for Unit 1 deleted section C.6 and Attachment 1 associated with the Transamerica Delaval Diesel Generators. Amendments 60 and 39 for Unit 1 and Unit 2, respectively, provided for power uprate. For ease of reference, the markup versions of the operating licenses (excluding the appendices) have been replaced with versions that have incorporated these changes.

Technical Specifications

Due to Amendments 66 and 45 for Unit 1 and Unit 2, respectively, the term licensee no longer appears on page 1-4. The term licensee is now defined on page 1-6.

Antitrust Conditions

As provided in the October 7, 1992 letter from GPC to the NRC, the wording was changed on Appendix C, page 4 for Unit 1 and Appendix C, page 4 for Unit 2. For ease of reference, the markup versions of Appendix C for both units have been replaced with versions that have incorporated these changes.

INSTRUCTIONS FOR UPDATING DOCUMENTS

Appear before each of these sections and serve as dividers

Description of Changes to the Operating Licenses

INSTRUCTIONS FOR UPDATING DOCUMENT

Replace Page 1

Replace Page 2

Attachment C
Description of Changes to the Operating Licenses

This section provides a general description of the changes to the operating licenses being proposed. The proposed revisions to the operating licenses, including Appendices A, B, and C, are provided immediately following this description.

OPERATING LICENSES

The proposed operating license changes were created using the following criteria:

1. Southern Nuclear will be the operator and have exclusive responsibility and control over the physical construction, operation, and maintenance of the facility.
2. Georgia Power Company, Ogelthorpe Power Corporation, Municipal Electric Authority of Georgia, and City of Dalton, Georgia, will be the Owners of the facility.
3. Many license conditions required certain information be supplied to the NRC or certain activities be performed within certain times frames. Where license conditions were historical only and were required to be implemented during the time interval that only Georgia Power Company was authorized to possess, use, and operate the facility, Georgia Power Company was used to identify the responsible party for that activity.
4. For clarification of the responsibilities between Southern Nuclear, Georgia Power Company and the other Owners of the facility, the use of the term "licensee" was generally avoided in modifying the operating licenses. In those places where the term licensee remains in the Technical Specifications and Environmental Protection Plan, unless otherwise noted, the reference is to Southern Nuclear.
5. Because Southern Nuclear will not own the assets of the facility, the financial provisions of Section 170 of the Atomic Energy Act of 1954 will apply only to the Owners and not to Southern Nuclear.
6. The physical security and contingency, and guard training and qualification plans have been updated to reflect the latest revision dates. The revision dates were changed per letter dated October 15, 1992. Since the latest revision dates have changed during the lapsed time, the dates in this submittal are the most current dates. The physical security and contingency plans were listed on the original application as two documents, but the operating licenses have been changed to reflect that the physical security plan and the contingency plan are one document.

TECHNICAL SPECIFICATIONS (APPENDIX A TO THE OPERATING LICENSES)

Several places in the Technical Specifications identify responsibilities of the licensee. In order to clarify these responsibilities, as indicated under the operating license discussion above, the term licensee has been defined as Southern Nuclear on Page 1-6 of the Technical Specifications.

ENVIRONMENTAL PROTECTION PLAN (APPENDIX B TO THE OPERATING LICENSES)

When Southern Nuclear becomes the VEGP Units 1 and 2 licensed operator, Southern Nuclear also will become responsible for compliance with the Environmental Protection Plan (EPP) and will enter into the necessary contractual arrangements to accomplish this task. As a part of this responsibility, the NPDES Permit and other environmental authorizations will be transferred or amended to designate Southern Nuclear as the holder. The NRC will be notified when this occurs in accordance with Section 3.2 of the EPP.

Changes are being recommended to the EPP for VEGP, Units 1 and 2 as follows:

1. Since Southern Nuclear will become responsible for compliance with the EPP of each unit, the cover sheet should be changed accordingly.
2. As indicated above in the operating license section, within the EPP the term licensee will refer to Southern Nuclear. A note has been added on Page 1-1 providing this clarification.
3. Section 4.2.3 titled "Maintenance of Transmission Line Corridors" specifies that herbicide records be maintained by the "licensee's" Transmission Operating and Maintenance Department. Since the transmission line corridors will continue to be maintained by Georgia Power Company, the phrase "licensee's" will be changed to "Georgia Power Company's". In accordance with Section 5.1 of the EPP, Southern Nuclear will review and audit the EPP programs, including those aspects of the EPP being maintained by Georgia Power Company, to assure compliance.
4. Section 4.2.4 requires that Georgia Power Company provide in its annual report any transmission noise monitoring complaints related to specific VEGP transmission lines and the actions taken in response to those complaints. Since Southern Nuclear will be responsible for the annual report and since such complaints could be received by Southern Nuclear, this section has been changed to read "Complaints received by Georgia Power Company or Southern Nuclear".

ANTITRUST CONDITIONS (APPENDIX C TO THE OPERATING LICENSES)

The antitrust conditions were changed to remove the term licensee so as to more clearly denote Georgia Power Company in the existing antitrust conditions. In addition, a new section was added stating that Southern Nuclear will not market or broker power or energy from the VEGP.

There were wording revisions made to the antitrust conditions based on a conversation between GPC and the NRC. These revisions were made per letter dated October 7, 1992 and were made for better clarity and precision.

Operating License Changes

INSTRUCTIONS FOR UPDATING DOCUMENT

Unit 1 Operating License (NPF-68)
(Excluding Appendices A, B and C)
Replace all Unit 1 marked pages

Unit 2 Operating License (NPF-81)
(Excluding Appendices A, B and C)
Replace all Unit 2 marked pages