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NED-85-448
1770N

June 28, 1985

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
IMPLEMENTATION OF INTEGRATED SCHEDULES

Gentlemen:

This letter is in response to Generic Letter 85-07: "Implementation of Integrated Schedules for Plant Modifications," dated May 2, 1985. The requested response format is attached. The following is provided on Georgia Power Company's (GPC) plans to implement an informal Integrated Schedule for modifications to Plant Hatch, Units 1 and 2. Although we strongly subscribe to a more structured, pre-planned approach to plant changes, we have numerous concerns if such changes, and the adherent schedules were to become a formal license condition.

GPC has developed a scheduling program which tracks the status of plant modifications. We are in various stages of implementation: such as, adding manpower requirements, costs, and engineering schedules.

GPC's scheduling program is intended to provide an auditable, structured, and routine process for planning plant modifications. When complete, it will also provide an integrated planning database and supporting control systems to assist GPC in:

1. Integrating activities for all plant modifications;
2. Improving workload scheduling;
3. Supporting project planning needs.
4. Reducing costs.

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GPC is not developing a scheduling document that would become a formal licensing condition with the NRC. Before implementing a formal program, several issues would need to be addressed. Three of the major issues are discussed below:

1. GPC establishes commitment dates for NRC required activities based on many variables, some of which are the safety importance of the required modification, amount of engineering work required, materials delivery, scope of construction activities, other modifications which must be made, outage length, etc. Schedules must be flexible to allow for unforeseen problems. Making the actual schedules a formal license condition seems to impose an additional burden for handling these unforeseen problems.

Several criteria would need to be established which would allow an acceptable implementing schedule to be developed and maintained. How binding these criteria would be to both the NRC and GPC would be a central concern.


2. One of the reported fundamental benefits of a formal integrated schedule program is the added assurance that plant betterment projects will have an opportunity to be scheduled and completed. GPC will need to better understand how the NRC will show restraint from rescheduling these plant betterment projects as new regulatory issues are identified.
3. Philosophically, we should all want to see a decrease in NRC-initiated modifications (i.e., the plant is "safe" enough). We see no open expression of this objective. And, of course, a licensed integrated plan has less merit as the number of backfits is reduced. (Since it is theoretically easier to manage fewer modifications.)

Therefore, GPC is implementing only an informal integrated plan. An informal program provides the structured management, yet allows rescheduling to meet operational, regulatory, financial, and other criteria. We do see benefits which the NRC staff would derive from the formal licensed approach, such as decreasing the need to issue confirmatory orders. GPC is willing to meet with the NRC staff to discuss our reservations regarding a formal integrated schedule program.

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If you have any further questions, please contact this office.

Very Truly Yours,



L. T. Gucwa

MJB/mb

Enclosure

xc: J. T. Beckham, Jr.
H. C. Nix, Jr.
J. N. Grace (NRC- Region II)
Senior Resident Inspector

ENCLOSURE 2

RESPONSE FORMAT - GENERIC LETTER 85-

PLANT NAME: Edwin I. Hatch Units 1 and 2

UTILITY: Georgia Power Company

I. INTENTIONS

- A. Intend to work with the staff to develop an ILS _____
- B. Have reservations that must be resolved before developing ILS _____
- C. Do not presently intend to negotiate an ILS with the staff _____
- D. Plan to implement an informal ILS only XXX

II. STATUS

A. If you answered I.A above:

1. Have you settled on a method for prioritizing the work at your plant(s)?

Circle One: Yes No

If yes, select best description:

Engineering judgement _____
Analytic Hierarchy process _____
Risk based analysis _____
Cost-benefit analysis _____
Other (please describe) _____

If no, provide estimated date for selecting a methodology: _____
Date

or

If not presently available, provide estimated date for scheduling the selection of a methodology: _____

2. What is your estimated date for making a submittal to the NRC- _____

or

If not presently available, planned date for scheduling a submittal to the NRC _____

B. If you answered I.B above:

1. Please explain your reservations on separate sheet(s) or provide your schedule for supplying an explanation

See separate sheet(s)

or

Separate submittal scheduled for

(Date)

2. If available to meet with the staff to discuss your concerns, propose a time frame for such a meeting and provide a contact that can make arrangements

Contact/Time Frame _____

Phone Number _____

C. If you answered I.C

1. Would you be willing to meet with the staff to discuss the development of an ILS for your facility(s)?

Circle One: Yes No

If yes, propose a time frame for such a meeting and provide a contact that can make arrangements.

Contact _____

Time Frame _____

Phone Number _____

If no, any constructive comments you have would be appreciated.

III. ADDITIONAL ITEMS

Please make any suggestions you may have as to how a utility sponsored availability/reliability project might be credited for plant safety enhancement. Provide additional constructive comments as appropriate.