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Office of Nuclear Reactor Regulation
Attention: Mr. Harold R. Denton, Director
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPK-57, NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2
IMPROVEMENTS TO TECHNICAL SPECIFICATIONS

Georgia Power Company has reviewed the Technical Specification improvement proposals recently provided to you by the NRC Technical Specification Improvement Project (TSIP) and the AIF Subcommittee on Technical Specifications. These reports share many recommendations for Technical Specification improvement. The recommendations provided in these reports are long overdue and represent a significant step towards a balanced and more reasoned regulatory approach. The need for timely action to implement these recommendations cannot be overemphasized; safer and more cost-effective operation of nuclear power plants resulting from these improvements will benefit the utility industry, the NRC and the public. We intend to commit resources to implement these improvement items as soon as NRC approval is granted.

Georgia Power Company is dedicated to the production of electricity in the safest and most economical manner practicable. The present Technical Specifications for Plant Hatch Units 1 and 2, which contain widely differing requirements for essentially identical units, can be regarded as an impediment to this goal. The evolution of Technical Specifications over the years has resulted in a disparity of scope, detail and requirements from plant to plant, and in our case, from unit to unit. The NRC TSIP report concludes that no "acute" safety problem exists with the current system of Technical Specifications. However, the dissimilarities between the Plant Hatch Unit 1 and 2 Technical Specifications create difficulties in operator training, usage, and understanding which we believe potentially degrade the overall safety of the plant.

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U. S. Nuclear Regulatory Commission
Mr. Harold R. Denton
December 2, 1985
Page 2

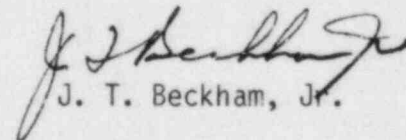
In addition to actual plant safety, perceived plant safety can in many ways be affected by the scope and complexity of the plant's Technical Specifications. In particular, the number and nature of violations received, which are subject to much public scrutiny, are directly tied to the content of the Technical Specifications. Plants with later, more complex Technical Specifications receive more violations. More uniformity and objective balance of regulation could be ensured by adoption of NRC Standard Technical Specifications (STS) for all plants. However, requirements contained in the latest STS have become so onerous as to provide a disincentive for voluntary adoption. This would not be the case with the new, reduced scope, STS proposed in the AIF and NRC TSIP reports.

In the interest of timeliness, we support expeditious issuance of an NRC Policy Statement supporting the program of Technical Specification improvements. However, we wish to endorse the AIF recommendation that rulemaking be employed as the permanent vehicle for the improvement program. The Technical Specifications are tied strongly, and in many places, to the Code of Federal Regulations. Our commitment of resources to a major effort to upgrade the Plant Hatch Technical Specifications to the new STS must be based on an understanding that the process will not de-evolve to the current state. Codification through rulemaking would provide a much greater assurance of a set regulatory approach on which we may rely. Rulemaking can proceed in a timely fashion.

To summarize, in the interest of fair, consistent, and prudent regulation, Georgia Power Company requests that a diligent and expeditious effort be made to obtain NRC endorsement of the Technical Specification improvements delineated in the above reports. We believe that the vast majority of other utilities would join us in our commitment to proceed with these improvement items following NRC endorsement.

Please do not hesitate to contact me for further discussion of this matter.

Very truly yours,


J. T. Beckham, Jr.

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