



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW, SUITE 23T85
ATLANTA, GEORGIA 30303-8931

September 19, 2005

EA-05-134

Southern Nuclear Operating Company, Inc.
ATTN: Mr. H. L. Sumner
Vice President - Hatch Project
P. O. Box 1295
Birmingham, AL 35201-1295

SUBJECT: FINAL SIGNIFICANCE DETERMINATION FOR A WHITE FINDING (HATCH
NUCLEAR PLANT INSPECTION REPORT NO. 05000321/200500009,
05000366/200500009)

Dear Mr. Sumner:

The purpose of this letter is to provide you with the Nuclear Regulatory Commission's (NRC) final significance determination for a finding involving the removal of the Technical Support Center (TSC) from service on April 25, 2005, to perform ventilation system modifications. The finding was documented in NRC Integrated Inspection Report No. 05000321/2005003 and 05000366/2005003, issued on July 8, 2005, and was assessed under the significance determination process as a preliminary White issue (i.e., an issue of low to moderate safety significance which may require additional NRC inspection). The cover letter to the inspection report informed Southern Nuclear Operating Company, Inc., (SNC) of the NRC's preliminary conclusion and provided SNC an opportunity to request a regulatory conference on this matter.

At SNC's request, an open regulatory conference was conducted on August 16, 2005, to discuss SNC's position on this issue. The enclosures to this letter include the list of attendees at the regulatory conference and material presented by SNC and NRC.

During the conference, SNC provided details related to its pre-modification activities, and its assessment of the significance of the issue. SNC stated that comprehensive preparations were planned and taken before commencement of modification activities such that key emergency response organization members would have been able to perform their tasks without compensatory measures from the main control room (MCR). SNC advised that the MCR would be used as the alternate location for TSC functions as this location was approved for use in the Emergency Plan, was evaluated by SNC as capable of being used successfully to execute TSC functions to support emergency response, and was reaffirmed in SNC's planning process prior to beginning the modification. Prior to taking the TSC out of service, SNC also reviewed procedures that governed the execution of TSC responsibilities and made procedural changes as necessary. Based on the foregoing, SNC concluded that the planning standard function was maintained and, correspondingly, that the finding was of very low safety significance (Green). SNC did not contest the NRC determination that the finding represented a violation of 10 CFR 50.54(q) and 10 CFR 50.47(b)(8). In addition, SNC provided details of its corrective actions in response to the finding.

After considering the information developed during the inspection and the information SNC provided at the conference, the NRC has concluded that the final inspection finding is appropriately characterized as White in the emergency preparedness cornerstone. In summary, the NRC concluded that the removal of the TSC from service for more than 7 days represented the loss of a planning standard function as described in NRC Inspection Manual Chapter 0609, Appendix B, Emergency Preparedness Significance Determination Process. Although the use of the MCR as an alternate TSC location during planned TSC outages is permitted by the Emergency Plan, the NRC considers this to be a temporary measure while repair activities proceed with high priority. Further, the Emergency Plan specifies that using the MCR as an alternate TSC is permitted only if the TSC becomes "uninhabitable during an emergency." In this case, the TSC did not become uninhabitable during an emergency, and SNC's original TSC outage schedule of approximately 5 weeks was not commensurate with the intent to proceed with high priority.

You have 10 calendar days from the date of this letter to appeal the staff's determination of significance for the identified finding. Such appeals will be considered to have merit only if they meet the criteria given in NRC Inspection Manual Chapter 0609, Attachment 2.

The NRC also determined that a violation of 10 CFR 50.54(q) and 10 CFR 50.47(b)(8) occurred because facilities and equipment to support the emergency response were not provided and maintained. The violation is set forth in the enclosed Notice of Violation.

You are not required to respond to this letter unless the description herein does not accurately reflect your position or if you choose to provide additional information. For administrative purposes, this letter is issued as a separate NRC Inspection Report, No. 05000321/200500009, 05000366/200500009, and the above violation is identified as VIO 0500321,366/200500009-01, Failure to Maintain Facilities and Equipment to Support Emergency Response. Accordingly, Apparent Violation 05000321,366/2005003-01, is closed.

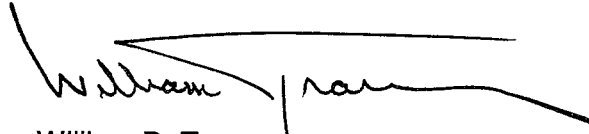
In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response (should you choose to provide one) will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS) which is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, any response should not include any personal privacy, proprietary, classified, or safeguards information so that it can be made available to the Public without redaction. The NRC also includes significant enforcement actions on its Web site at www.nrc.gov; select **What We Do, Enforcement**, then **Significant Enforcement Actions**.

SNC

3

Should you have any questions regarding this letter, please contact Mr. Malcolm Widmann, Chief, Branch 2, Division of Reactor Projects, at (404) 562-4550.

Sincerely,

A handwritten signature in black ink, appearing to read "William D. Travers". The signature is written in a cursive style with a long horizontal stroke extending to the right.

William D. Travers
Regional Administrator

Docket Nos. 50-321, 50-366
License Nos. DPR-57 and NPF-5

Enclosures:

1. Notice of Violation
2. List of Attendees
3. Material presented by SNC
4. Material presented by NRC

SNC

4

cc w/encls:

J. T. Gasser
Executive Vice President
Southern Nuclear Operating Company, Inc.
Electronic Mail Distribution

George R. Frederick
General Manager, Plant Hatch
Southern Nuclear Operating Company, Inc.
Electronic Mail Distribution

Raymond D. Baker
Manager Licensing - Hatch
Southern Nuclear Operating Company, Inc.
Electronic Mail Distribution

Arthur H. Dombey, Esq.
Troutman Sanders
Electronic Mail Distribution

Laurence Bergen
Oglethorpe Power Corporation
Electronic Mail Distribution

Director
Department of Natural Resources
205 Butler Street, SE, Suite 1252
Atlanta, GA 30334

Manager, Radioactive Materials Program
Department of Natural Resources
Electronic Mail Distribution

Chairman
Appling County Board of Commissioners
69 Tippins Street., Suite 201
Baxley, GA 31513

Resident Manager
Oglethorpe Power Corporation
Edwin I. Hatch Nuclear Plant
Electronic Mail Distribution

Senior Engineer - Power Supply
Municipal Electric Authority
of Georgia
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Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

Distribution w/encls:

- L. Reyes, EDO
- J. Dyer, NRR
- W. Borchardt, NRR
- L. Chandler, OGC
- J. Moore, OGC
- E. Julian, SECY
- B. Keeling, OCA
- Enforcement Coordinators
 - RI, RIII, RIV
- E. Hayden, OPA
- G. Caputo, OI
- H. Bell, OIG
- C. Carpenter, NRR
- F. Bonnett, NRR
- C. Gratton, NRR
- R. Kahler, NSIR
- M. Johnson, OE
- L. Trocine, OE
- D. Starkey, OE
- L. Plisco, RII
- V. McCree, RII
- C. Casto, RII
- M. Widmann, RII
- D. Simpkins, RII
- S. Sparks, RII
- C. Evans, RII
- B. Bonser, RII
- R. Hannah, RII
- K. Clark, RII
- PUBLIC
- OEMAIL
- OEWEB

X SISP REVIEW COMPLETE: Initials: _____ SISP REVIEW PENDING*: Initials: _____ *Non-Public until the review is complete
 X PUBLICLY AVAILABLE NON-PUBLICLY AVAILABLE SENSITIVE NON-SENSITIVE
 ADAMS: X Yes ACCESSION NUMBER: _____

OFFICE		RII	RII/DRP	OE	NRR	NSIR/EP	
SIGNATURE				w/Comments	IIPB N/A per		
NAME		CEVANS	CCASTO	C. Nolan	P. Bonnett	B. Kahler	
DATE				09/15/05	09/06/05	09/12/05	
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

Distribution w/encls:

- L. Reyes, EDO
- J. Dyer, NRR
- W. Borchardt, NRR
- L. Chandler, OGC
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 ADAMS: X Yes ACCESSION NUMBER: _____

OFFICE		RII	RII/DRP	OE	NRR	NSIR	
SIGNATURE		<i>cl</i>	<i>cl</i>				
NAME		CEVANS	CCASTO				
DATE		8/31/05	9/1				
E-MAIL COPY?	YES NO	YES NO	YES <input checked="" type="checkbox"/> NO	YES NO	YES NO	YES NO	YES NO

NOTICE OF VIOLATION

Southern Nuclear Operating Company
Edwin I. Hatch Nuclear Plant
Units 1 and 2

Docket Nos. 50-321 and 50-366
License Nos. DPR-57 and NPF-5
EA-05-134

During an NRC inspection completed on June 30, 2005, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 50.54(q) requires, in part, that a licensee authorized to operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in Section 50.47(b). 10 CFR 50.54(q) also states that a licensee may make changes to these plans without Commission approval only if the changes do not decrease the effectiveness of the plans and the plans, if changed, continue to meet the standards of Section 50.47(b).

10 CFR 50.47(b)(8) requires that adequate emergency facilities and equipment to support the emergency response be provided and maintained. Section H of Revision 18 of the Edwin I. Hatch Nuclear Plant Emergency Plan, which implements the requirements of 10 CFR 50.47(b)(8), states that in the event that the Technical Support Center (TSC) becomes "uninhabitable during an emergency," the control room will serve as an alternate TSC location.

Contrary to the above, between April 25 and May 4, 2005, the licensee failed to maintain in effect a provision of its emergency plan in that adequate emergency facilities and equipment to support the emergency response were not provided. In this case, the licensee failed to follow and maintain in effect its emergency plan when the TSC was removed from service during this period to allow for modification activities. The removal of the TSC for the modification did not represent a condition in which the TSC was uninhabitable during an emergency.

This violation is associated with a White Significance Determination Process finding for Units 1 and 2 in the emergency preparedness cornerstone.

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance was achieved is already adequately addressed on the docket in the information provided by SNC at the conference (Enclosure 3). However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation - EA-05-134," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you contest this enforcement action, you should also provide a copy of your response with the basis for your denial to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

In accordance with 10 CFR 19.11, you may be required to post this Notice within 2 working days.

Dated this 19th day of September 2005

LIST OF ATTENDEES

Nuclear Regulatory Commission:

L. Plisco, Deputy Regional Administrator
C. Casto, Director, Division of Reactor Projects (DRP)
J. Shea, Deputy Director, DRP
H. Christensen, Deputy Director, Division of Reactor Safety (DRS)
D. Simpkins, Senior Resident Inspector, Edwin I. Hatch Nuclear Plant, DRP
C. Rapp, Senior Project Engineer, DRP
L. Miller, Senior Emergency Preparedness Inspector, DRS
J. Kreh, Emergency Preparedness Inspector, DRS
C. Evans, Director, EICS
S. Sparks, Enforcement Specialist, EICS
L. Trocine, Office of Enforcement
B. Bonser, Chief, Plant Support Branch 2, DRS
A. Richardson, Security Specialist, Division of Nuclear Security and Incident Response (NSIR)
J. Wallo, Senior Security Inspector, DRS
R. Trojanowski, Regional State Liaison Officer
J. Polickoski, Project Engineer, DRP
G. Williams, Project Engineer, DRP
N. Sanfilippo, NSIR (telecon)
R. Kahler, NSIR (telecon)

Southern Nuclear Operating Company, Inc.

H. L. Sumner, Vice-President, Hatch Project
G. Frederick, General Manager, Hatch Nuclear Plant
R. Baker, Licensing Manager, Hatch Project
D. Burford, Nuclear Fleet Security & Emergency Preparedness Manager
B. George, Nuclear Licensing Manager
J. Lewis, Training and Emergency Preparedness Manager - Hatch Nuclear Plant
W. Lee, Emergency Planning Supervisor
B. Terry, General Counsel and Vice President of External Affairs

SNC Regulatory Conference With NRC

Technical Support Center

August 16, 2005

Lewis Sumner

SNC Vice President – Plant Hatch

George Frederick

Plant Hatch General Manager



Lewis Sumner

INTRODUCTION and PURPOSE



Introduction and Purpose

- ◆ **Provide additional information before the completion of the Significance Determination Process (SDP) for the Hatch Technical Support Center (TSC) modification**
- ◆ **Achieve common understanding of the facts**
- ◆ **Discuss missed opportunities**
- ◆ **Review SNC's corrective actions**

Background

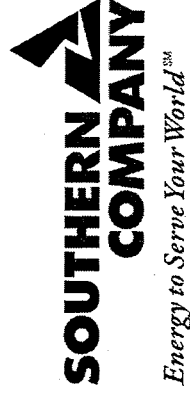
- ◆ **Guidance/Requirements Documents**
- ◆ **Job Planning Assumptions**



Background Information

◆ Pertinent Documents

- From IMC 0609, Appendix B, 4.8 10 CFR 50.47(b)(8):
 - » The Planning Standard functions are: Adequate facilities are maintained to support emergency response, and adequate equipment is maintained to support emergency response.
- Also from IMC 0609, Appendix B 10 CFR 50.47(b)(8):
 - » Examples of Loss of PS Function (White finding) include –
 - ◆ The OSC, TSC, or EOF is not functional for a period of longer than 7 days from the TIME OF DISCOVERY, to the extent that any key ERO member (IAW NEI 99-02) could not perform his/her assigned Plan functions, in the absence of compensatory measures. In the event of major disruptive events (e.g., hurricane, fire, explosion, loss of power, etc.) or planned outages, compensatory measures are acceptable while repair activities proceed with high priority.



Background Information

◆ Pertinent Documents (continued)

- From IMC 0609, Appendix B (2.1(h)) Loss of Planning Standard Function:
 - » Program elements are not adequate, not compliant with the PSs of 10 CFR 50.47(b), or otherwise not functional to such an extent that the function of the PS is not available for emergency response. It may be that the Plan commitments are not met or are inadequate, implementing procedures are inadequate, program design is inadequate, etc. The result is that if the suspect PROGRAM ELEMENT was implemented as designed, or personnel are not capable of implementing the PROGRAM ELEMENT, the PS FUNCTION would not be met.

- From IMC 0609, Appendix B (2.1(j)) Program Element:
 - » Items that comprise the implementation aspects of a Planning Standard function. These items correspond to the criteria (e.g., contained in NUREG-0654/FEMA-REP-1 or the licensee's Emergency Plan) that provides specific acceptable methods for complying with the PLANNING STANDARDS of 10 CFR 50.47(b). Note that the failure of a single PROGRAM ELEMENT does not always constitute a LOSS OF PLANNING STANDARD FUNCTION.



Background Information

◆ Pertinent Documents (continued)

- From IMC 0609, Appendix B, item 4.0 Failure to Comply:
 - » A LOSS OF PS FUNCTION is more significant than a FAILURE TO COMPLY with individual requirements associated with a given PLANNING STANDARD. The PLANNING STANDARDS often have several elements, and Appendix E to 10 CFR Part 50 contains supporting requirements that generally align with each PLANNING STANDARD. Those supporting requirements are cited within the guidance for each PLANNING STANDARD. However, PLANNING STANDARD functionality does not require compliance with every requirement. The failure of a program to comply with one or even a few of the associated requirements does not necessarily mean a LOSS OF PS FUNCTION. Consequently, the staff must determine whether the PS FUNCTION is met, even with the noncompliance. If the function is met, there is a FAILURE TO COMPLY without a LOSS OF PS FUNCTION.

- From the Hatch Emergency Plan:
 - » In the event the TSC becomes uninhabitable during an emergency, the Control Room will serve as an alternate location for TSC Management.



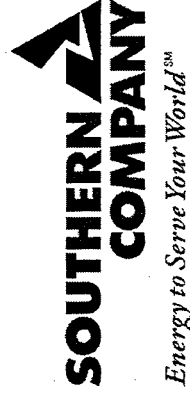
Energy to Serve Your WorldSM

Background Information

- ◆ **Job Planning Assumptions**
 - Work is necessary to enhance existing TSC.
 - Work would not start until all preparations in place.
 - » Multiple review sessions held to assess readiness
 - » Management would permit start of work when satisfied with state of readiness
 - The onsite EP organization would help validate the work plans and preparations.
 - Alternate location for TSC would be designated beforehand in case an emergency occurred during the time the work was in progress.

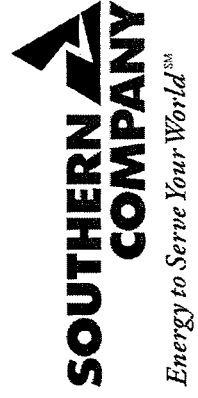
Background Information

- ◆ **Job Planning Assumptions (continued)**
 - The alternate location for TSC Management:
 - » Approved for use in the Emergency Plan
 - » Evaluated as capable of executing the TSC functions to support emergency response
 - » No compensatory measures required for key ERO personnel to perform their functions
 - » Reaffirmed in planning process prior to job start
 - Procedures that govern the execution of TSC responsibilities while in the alternate location would be scrutinized prior to taking the stand-alone TSC out of service.
 - » Opportunities for enhancements were found
 - » Procedures were changed

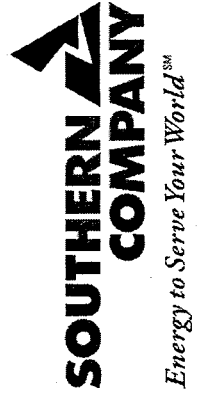
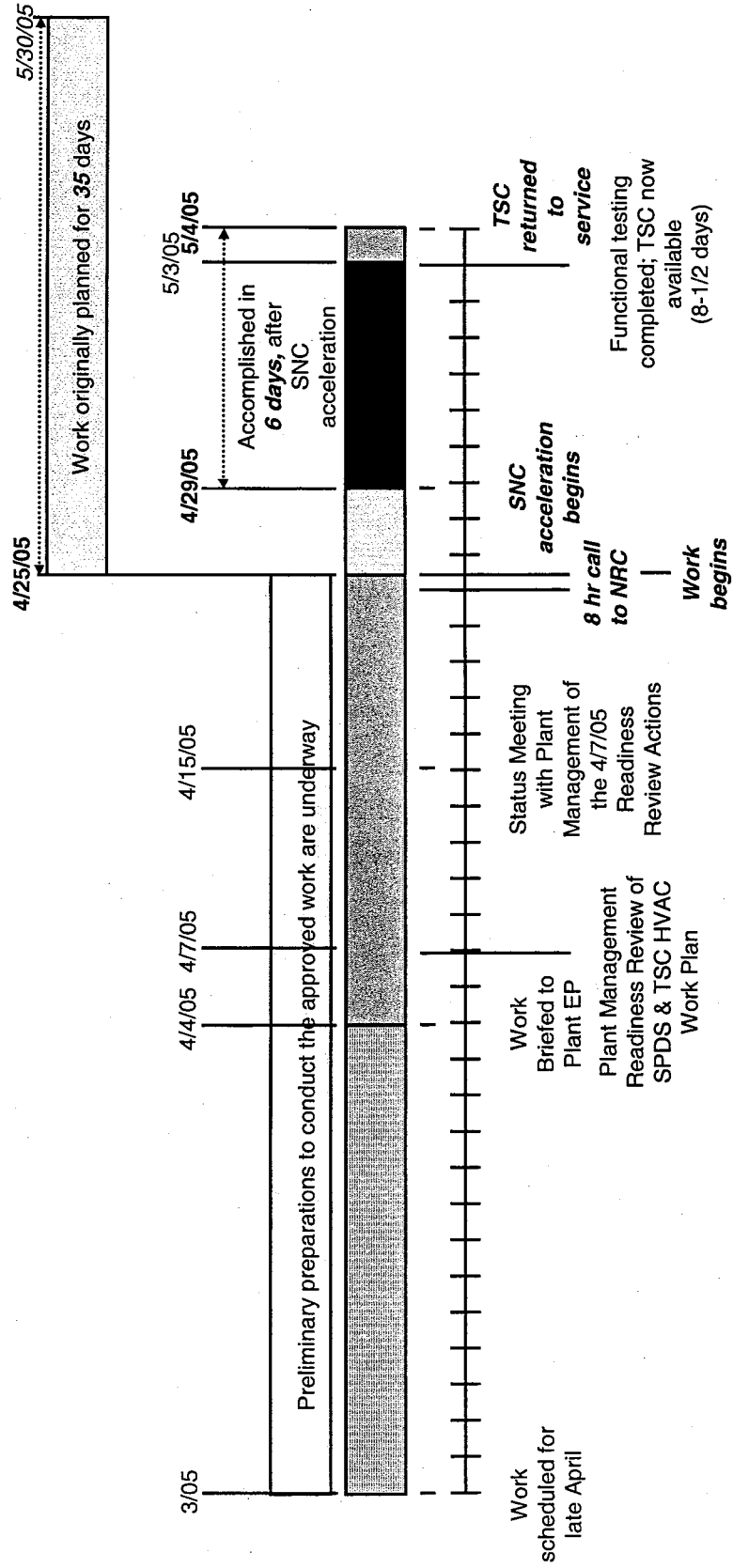


George Frederick

EVENT REVIEW



Hatch TSC issue - Timeline of events

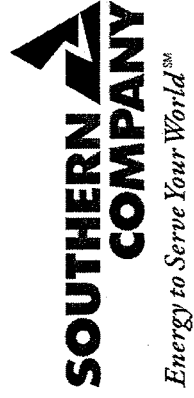


Timeline not to scale

Event Review

◆ Event Description:

- Southern Nuclear took the TSC ventilation controls out of service for facility upgrades from April 25, 2005 to May 4, 2005.
 - » Did not perform an evaluation per 10 CFR 50.54(q)
 - » During the time the stand-alone TSC ventilation controls were unavailable, adequate provisions remained in place to perform the TSC Management functions in the alternate location.

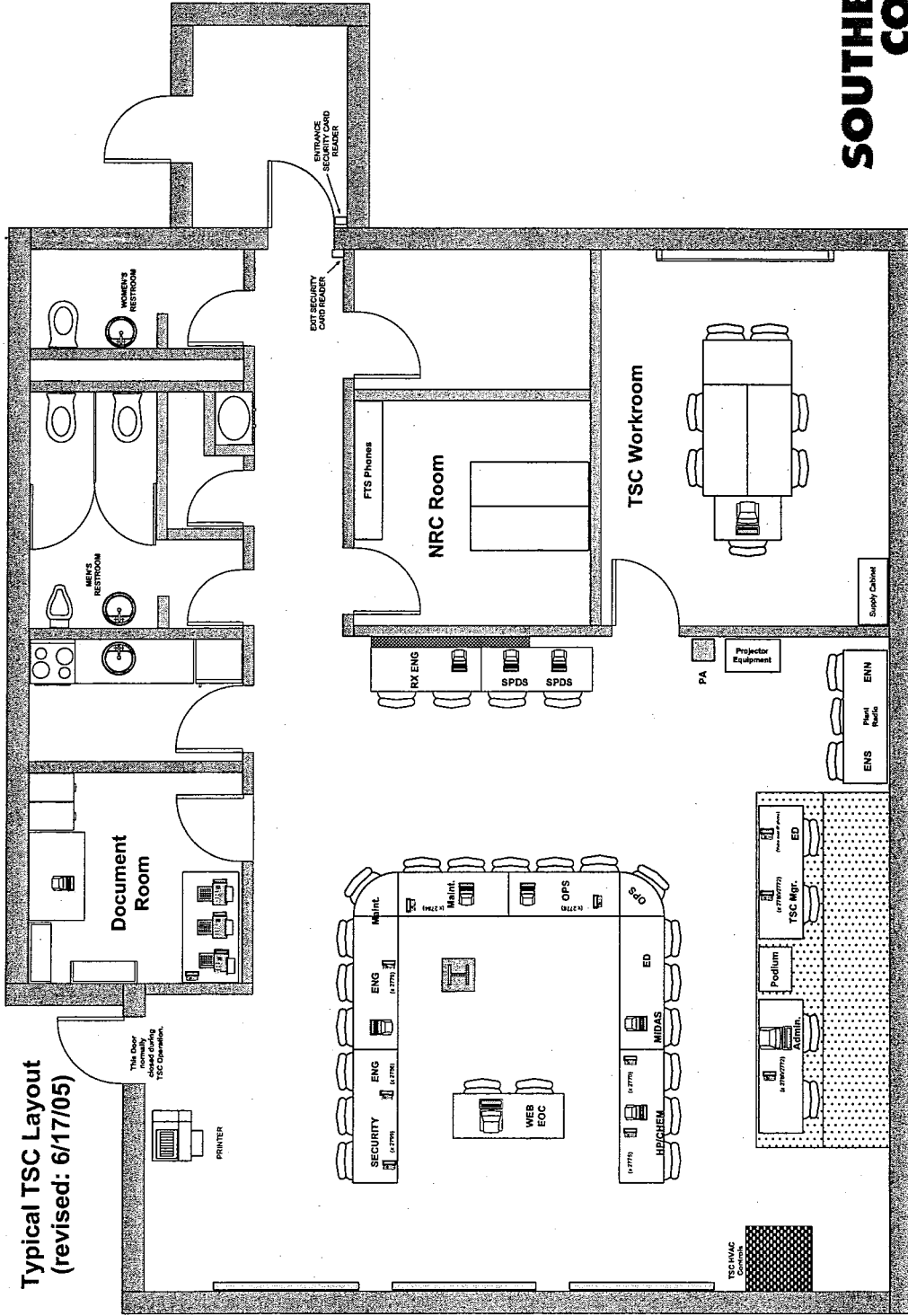


Event Review

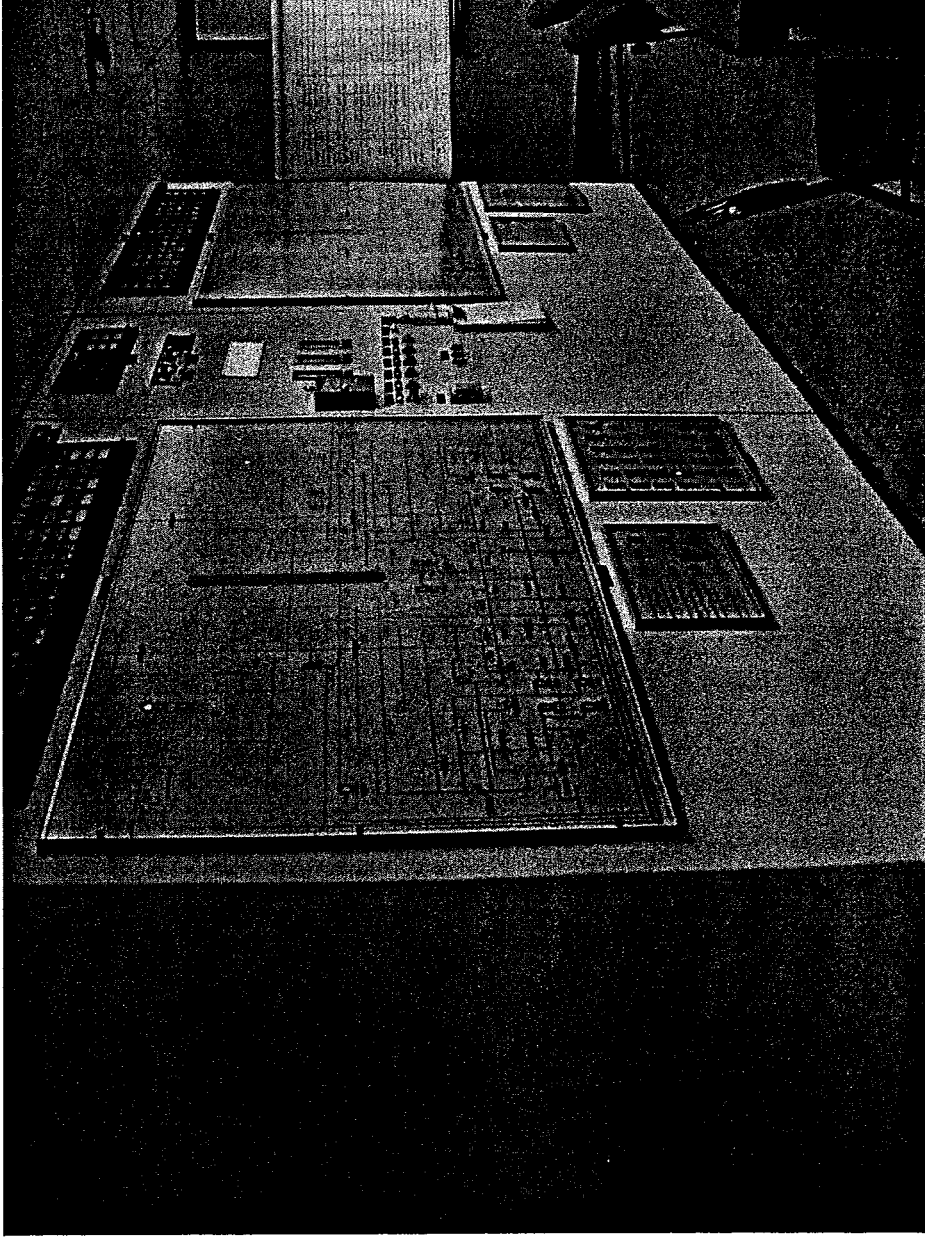
- ◆ **Event Timeline**
 - SPDS upgrade design was performed in two stages.
 - Unit 1 SPDS design process began in late-1999 and was completed May 29, 2001.
 - Unit 2 SPDS design process began in 2002 and was completed and approved in 2003.
 - Relocation of the TSC HVAC panel was part of the Unit 1 SPDS design upgrade.
 - Early 2005 – Design implementation discussions started.

TSC Layout

Typical TSC Layout
(revised: 6/17/05)

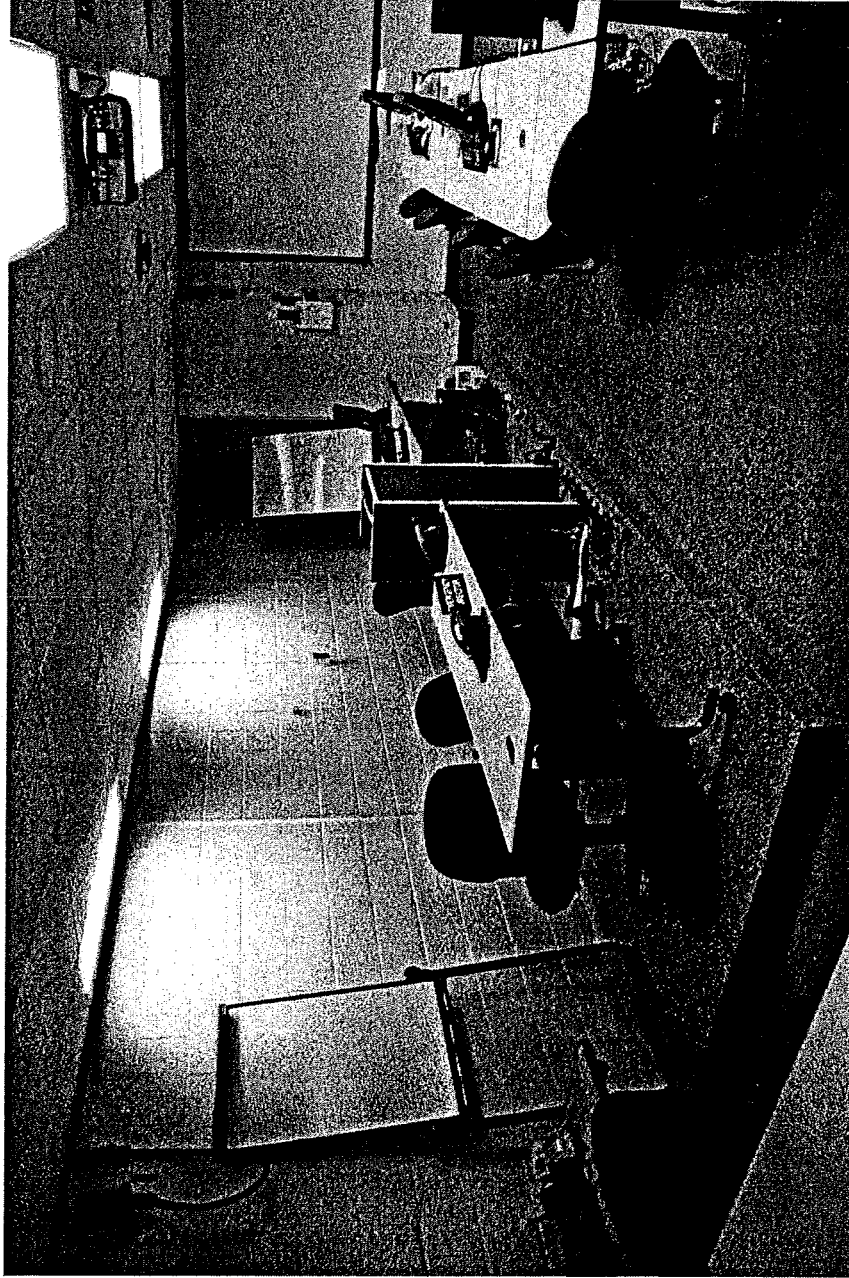


TSC Panel - Before



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TSC Panel - After



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COMPANY**
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Event Review

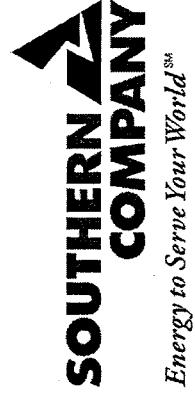
- ◆ **Event Timeline (Continued)**
 - April 7, 2005 and April 15, 2005 – Two readiness reviews were conducted with plant staff to ensure TSC functions could be performed from the main control room during the time work activities were being conducted in the TSC.
 - » Work scope and duration the TSC would be unavailable for use
 - » Space accommodations for designated TSC staff who will report to the alternate TSC
 - » Space accommodations for other TSC staff personnel in work locations outside the alternate TSC
 - » Communications capability for designated TSC personnel relocated to the alternate TSC
 - » Method of providing information to the TSC staff regarding use of alternate location
 - » Availability of reference material for designated TSC staff who will report to the alternate TSC
 - » Revision of TSC Activation Procedure



Event Review

◆ Event Timeline (Continued)

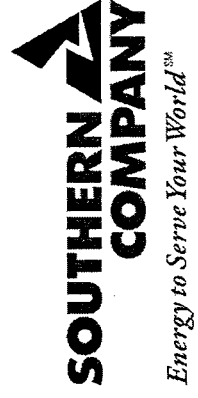
- April 25, 2005 – Final preparations leading to removal of TSC from service.
 - » TSC Activation Procedure revision was approved by plant management and was implemented
 - » 8-hour phone notification to NRC was made regarding removal of TSC from service and implementation of the alternate with no loss of TSC function. The TSC was taken out of service later in the day.
 - » Notifications provided to TSC responders regarding the expected protocol during the timeframe when the TSC would be out of service
- April 29 – 30, 2005 TSC Functional Requirements assessment was performed by multidisciplinary team at NRC request.
- April 29, 2005 TSC work schedule accelerated.



Event Review

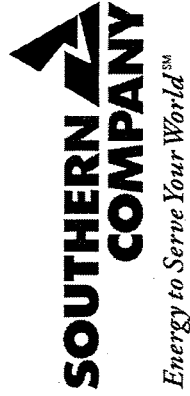
◆ Event Timeline (Continued)

- May 3, 2005 TSC available
 - » Functional testing complete
 - » Duration of unavailability of TSC was 8-1/2 days
- May 4, 2005 ERO notifications completed – stand-alone TSC in service.
- May 17, 2005 Results of the April 29-30 assessment were presented to NRC.
 - » TSC Functional Requirements Assessment examined comparability of functional requirements in the TSC and in the alternate TSC
 - » Assessment objective was to determine whether each functional requirement would be met from the alternate TSC without compensatory actions
 - » Assessment concluded the functional requirements would be met for each of the nine assessment areas without compensatory actions



Event Review

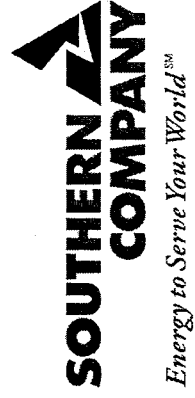
- ◆ **Event Timeline (Continued)**
 - May 17, 2005 Assessment (continued)
 - » Key ERO members would have been able to perform their tasks without compensatory measures
 - » Functional requirement areas were taken from the Emergency Plan:
 - ◆ Habitability
 - ◆ Occupancy
 - ◆ Communications
 - ◆ Facility Features
 - ◆ Records
 - ◆ Activation and Staffing
 - ◆ Emergency Supplies and Equipment
 - ◆ Accident Assessment
 - ◆ Assembly and Accountability



Event Review

◆ Event Summary

- Comprehensive preparations before starting the TSC ventilation modifications
- TSC was out about 8-1/2 days
- Key ERO personnel would have been able to perform their assigned tasks without compensatory measures



Event Review

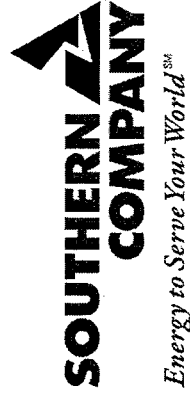
◆ Cause Evaluation

- Design change process controls focused on 10 CFR 50.59 regulatory evaluations.
 - » A major change in 2001 added the programs screening process for emergency plan under 10 CFR 50.54(q). This design modification predated the screening change performed under applicability determinations.
 - » No subsequent reviews were performed for modifications that predated the screening process.
 - » Narrow interpretation of a change to the emergency plan under 10 CFR 50.54(q) existed.

Event Review

◆ Cause Evaluation (Continued)

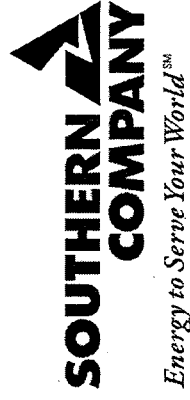
- Work management process controls relied on required evaluations to assure necessary regulatory requirements were met.
 - » Confidence in process controls resulted in a lessened awareness throughout the organization of the issues an evaluation could have identified. Thus, although opportunities existed to identify that the required 10 CFR 50.54(q) evaluation had not been performed, the omission was not identified.
 - » The omission of a 10 CFR 50.54(q) evaluation resulted in the design change package progressing to implementation planning with no regulatory flags being raised. This omission also contributed to the work being scheduled as routine work.



Event Review

◆ Corrective Actions

- A condition report to capture the omission of a 10 CFR 50.54(q) evaluation was entered in the Plant Hatch corrective actions program. An after-the-fact evaluation was performed based on procedural guidance that existed in May, 2005.
- A condition report was entered in the corporate corrective actions program to identify and incorporate industry best practices related to the process of assuring that all necessary regulatory evaluations are performed prior to implementing design or procedural changes.



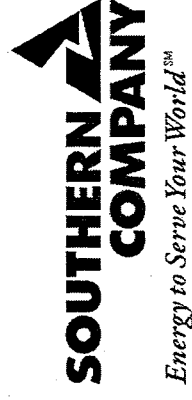
Event Review

- A condition report was produced to identify that a functional requirements evaluation was not documented prior to taking the TSC ventilation controls out of service.
- A condition report was produced to validate the revised Applicability Determination process.
- A condition report was produced based on the preliminary NRC finding regarding the TSC. This condition report has been assigned a category level that requires a root cause evaluation and a broadness review.

Event Review

◆ Corrective Actions (continued)

- On April 29, 2005 the work was rescheduled to be performed with high priority on placing the TSC back in service. The TSC was made available on May 3 and returned to service on May 4, 2005.
- A survey of industry screening evaluation practices was conducted that identified industry practices to broadly incorporate NRC's guidance as set forth in RIS 2005-02. The incorporation of more broadly-based criteria for evaluating emergency preparedness effectiveness at Plant Hatch is a key corrective action.
- As a validation of the revised process guidance, an evaluation was performed using the revised guidance in the 10 CFR 50.54(q) screening evaluation procedure.



Event Review

- ◆ **Corrective Actions** (continued)
 - A review of “approved” but not yet implemented design change packages is in progress in order to identify any other similar conditions.
 - A SNC internal Operating Experience document was issued to heighten awareness of Emergency Preparedness requirements. This OE will be incorporated into employee training.

Lewis Sumner

SUMMARY AND CONCLUSION

Summary and Conclusion

- ◆ In the process of making an improvement to the TSC, we were not comprehensive in our review of the change.
 - We looked at the end state of the change.
 - We also should have looked at the impact on the TSC availability during the change.

Summary and Conclusion

- ◆ We do believe that we did a comprehensive review of our emergency preparedness before we initiated work.
- ◆ We believe that the Planning Standard Function was maintained.
- ◆ When concerns were raised about the plan, we responded by completing the work promptly.
- ◆ We have put in place corrective actions and we continue to look for areas to improve.
- ◆ We are also sharing our experience with the rest of the fleet so that all can benefit from what we learned.



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Summary and Conclusion

- ◆ The experience has certainly left us with a heightened sense of awareness to EP issues, especially as it relates to examining the process of a change, not just its end state.
- ◆ We believe that the SDP guidance allows for adjustment of the prescribed significance determination after review of specific facts.
- ◆ SNC asks NRC to consider these points as you complete the SDP reviews and make a final determination regarding this issue.

AGENDA

OPENING REMARKS, INTRODUCTIONS AND MEETING INTENT

Mr. L. Plisco, Deputy Regional Administrator

NRC REGULATORY CONFERENCE POLICY

Mr. C. Casto, Director, Division of Reactor Projects

STATEMENT OF THE ISSUE WITH RISK PERSPECTIVES

Mr. C. Casto, Director, Division of Reactor Projects

SUMMARY OF APPARENT VIOLATION

Mr. C. Casto, Director, Division of Reactor Projects

LICENSEE RISK PERSPECTIVE PRESENTATION AND RESPONSE TO APPARENT VIOLATION

BREAK / NRC CAUCUS

Mr. C. Casto, Director, Division of Reactor Projects

CLOSING REMARKS

Mr. L. Plisco, Deputy Regional Administrator