Enclosure 1

Edwin I. Hatch Nuclear Plant
Description of and Justification for Changes to the
Quality Assurance Program

Description of Proposed Change:

Currently at Plant Hatch, the Plant Review Board (PRB) is responsible for reviewing all changes in safety-related plant design, procedures, and proposed tests and experiments. Georgia Power Company (GPC) is proposing a revision that provides a Qualified Reviewer who reviews safety-related documents for which the 10 CFR 50.59 screening questions that GPC uses are answered **NO**. GPC's screening portion of the 10 CFR 50.59 evaluation establishes whether or not the activity to which the safety evaluation applies represents the following:

1. ☐ Yes ☐ No A change to the plant as described in the FSAR?

2. ☐ Yes ☐ No A change to procedures as described in the FSAR?

3. ☐ Yes ☐ No A test or experiment not described in the FSAR?

4. ☐ Yes ☐ No A change to the Technical Specifications as incorporated in the operating license?

If all the above questions are answered **NO,** completion of GPC's seven 50.59 unreviewed safety question criteria, which determine the increase in the probability of accidents, the increase in the consequences of such accidents, and the reduction in the margin of safety, is not required. Thus, the PRB will not review the documents. The Qualified Reviewer only reviews the answers for the screening questions and their bases. That is, if at least one of the questions in the screening portion is answered **YES**, the seven 50.59 questions must be completed and the PRB will review that safety evaluation and the accompanying documentation. Therefore, under the proposed system, all changes to safety-related plant design and procedures will not receive PRB review. However, all safety-related changes will be reviewed by either the Qualified Reviewer or the PRB.

Justification for the Proposed Change:

Eliminating the PRB review of safety-related changes that do not require completion of the seven 50.59 unreviewed safety questions criteria portion of the evaluation, will reduce the burden of the PRB. Furthermore, reducing the amount of review material will provide more time for the PRB to focus on reviewing issues truly important to safety, instead of spending time reviewing changes of no safety consequence.

Basis for Concluding QA Program Criteria Are Still Met:

The intent of the PRB review of safety-related plant changes is to ensure no unreviewed safety question exists. The proposed review strategy, as described above, using the Qualified Reviewer maintains that intent for the following reasons:

1. The Qualified Reviewer will be responsible for ensuring the responses to the 10 CFR 50.59 screening criteria listed on the previous page reach the proper conclusions and the bases for the answers are adequate such that an independent reviewer would reach the same conclusions. The Qualified Reviewer's signature on the 50.59 evaluation form will serve as an independent evaluation verifying that an unreviewed safety question does not exist. However, if the Reviewer believes a particular screening question was answered erroneously, the document will be returned to the originator for further evaluation. The Qualified Reviewer will also determine whether or not additional cross-disciplinary review is required or desirable. If deemed necessary, the review will be performed by personnel of the appropriate discipline(s).

2. The Qualified Reviewer will be knowledgeable of plant operations and will satisfy the requirements of a PRB alternate.

3. Consistent with current practice, if any screening criteria question is answered **YES**, the PRB will review the document, the pertinent information, and the 50.59 safety evaluation.

Based on the above-listed reasons, adequate review for unreviewed safety questions will be maintained, and the criteria of the original QA program continues to be met.

Enclosure 2

Edwin I. Hatch Nuclear Plant
Revision to Quality Assurance Program
Corresponding Marked-Up FSAR Pages

The following marked-up Unit 2 Final Safety Analysis Report pages are included in this enclosure:

17.2-6 and insert page

17.2-13 and insert page

17.2-15 and insert page

17.2-16 and insert page

systems. These activities are governed by appropriate QA program procedures. The SNC MSAER performs, or causes to be performed, audits of these activities and procedures.

17.2.1.2 Plant Organization and Responsibilities for QA/QC

17.2.1.2.1 General Manager-Nuclear Plant (Hatch)

The GMNP (Hatch) has the site responsibility for implementation of the QA program at the plant site. He is responsible for compliance with the requirements of the Operating License and the Technical Specifications, and for the safe, reliable, and efficient operation of the HNP. The assistant general manager-plant operations (AGM-PO) and the assistant general manager-plant support (AGM-PS) report to the GMNP (Hatch). The organizational structure, the interface with the general office, and the qualifications of plant personnel are discussed in chapter 13.

17.2.1.2.2 Plant Review Board (PRB)

The PRB is comprised of the designated plant supervisory personnel or alternates and has advisory duties to the GMNP (Hatch). ~~The PRB reviews proposed safety-related plant procedures and changes thereto prior to approval by plant management and reviews all proposed changes to safety-related systems, components, and structures, and proposed tests and experiments.~~ The PRB reviews all reportable violations of the Technical Specifications and also screens subjects of potential concern to the SRB. (See paragraph 13.4.2.1.)

17.2.1.2.3 Manager-Operations

The manager-operations reports to the AGM-PO and has the responsibility to ensure the plant operates in accordance with written, approved procedures and license requirements. He must ensure operations personnel are trained and qualified and operations activities are governed by effective administrative controls. He is also responsible for the radwaste control program.

REV 1	7/83
REV 2	7/84
REV 3	7/85
REV 4	7/86
REV 5	7/87
REV 7	7/89
REV 8	7/90
REV 9C	7/91
REV 10C	7/92
REV 11B	1/93

INSERT 1

17.2.1.2.2 Qualified Reviewer/Plant Review Board

17.2.1.2.2.1 Qualified Reviewer

Qualified Reviewers are designated plant personnel. For documents that require a 10 CFR 50.59 evaluation, they review the document and the associated 10 CFR 50.59 evaluation when all of the screening questions of the evaluation are answered "NO".

If one of the 10 CFR 50.59 evaluation's screening questions is answered "YES", the Safety Evaluation portion of the 10 CFR 50.59 evaluation is required to be completed, and the document is reviewed by the Plant Review Board.

INSERT 2

The PRB reviews items for which the safety evaluation portion of the 10 CFR 50.59 evaluation requires completion. All such items that require completion of the safety evaluation portion will be reviewed as described in Supplement 13.4A.

thermal, hydraulic, radiation, and accident analyses; compatibility of materials; accessibility for inservice inspection, maintenance, and repair; and delineation of acceptance criteria of inspections and tests. Design procedures provide for review of applicable regulatory standards, design bases, and requirements of licenses, and ensure that these factors are taken into account in preparation of drawings, specifications, and other design documents. Changes in operating procedures made necessary by plant modifications are a consideration during design. Appropriate QA standards are specified in design specifications for control of the suppliers' and contractors' QA programs. Selection and review for suitability of application of materials, parts, equipment, and processes, including commercial-grade items that have been previously approved for a different application, are regarded as a part of design preparation and are performed in accordance with written procedures for design and specification preparation, review, approval, and release. Procedures require all designs to be checked in accordance with the provisions of ANSI N45.2.11 to ensure that design characteristics are controlled, inspected, and tested and that inspection and test criteria are identified. New or innovative design is subjected to comprehensive design review, which may include calculational checks or a testing program under adverse design conditions. Design documents and revisions are collected, distributed, stored, and maintained in a systematic manner to prevent inadvertent use of superseded documents. Significant errors and deficiencies in design and design control processes that could adversely affect safety-related structures, systems, and components are documented and corrective action taken to preclude repetition.

~~The PRB reviews all proposed modifications to safety-related systems to determine whether an unreviewed safety question (10 CFR 50.59) is involved.~~ Unreviewed safety questions and safety evaluations for changes to the plant are reviewed by the SRB in accordance with SRB procedures. Design change requests are forwarded to the MNEL for evaluation. The detailed engineering will be performed by an approved architect/engineer (A/E) organization using similar procedures developed and used in the original design of the plant with audits being conducted under the direction of the SAER department. Minor design changes are forwarded to the manager engineering support for evaluation. The scope of minor design changes is discussed with the A/E prior to implementation to determine whether A/E design involvement is

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REV 12A	10/93

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A Qualified Reviewer, or the PRB, as appropriate (See 13.4.2 and Supplement 13.4A), reviews all proposed modifications to safety-related systems to determine whether an unreviewed safety question (10 CFR 50.59) is involved with the change.

E. Completed, reviewed, and approved requisitions are forwarded to the material services department for processing and conversion into purchase orders.

F. All quality assurance records generated during the procurement document preparation process are forwarded to the plant documentation file for retention.

The materials supervisor and the materials engineering supervisor are responsible for ensuring that revisions or changes to onsite-generated procurement documents receive the same level of review and approval as did the original documents if the revision affects technical or quality requirements. The SNC engineering manager has this responsibility for offsite-generated procurement documents. SNC, as an agent for GPC, issues purchase orders from requisitions approved by GPC or SNC.

Assurance that the requirements of this section and those of applicable procedures are implemented is provided by the audit program described in subsection 17.2.18.

17.2.5 INSTRUCTIONS, PROCEDURES, AND DRAWINGS

Activities affecting quality are prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and are accomplished in accordance with these instructions, procedures, or drawings. They contain appropriate quantitative (such as dimensions, tolerances, and operating limits) or qualitative (such as workmanship and samples) acceptance criteria for determining whether important activities have been satisfactorily accomplished.

17.2.5.1 Plant Procedures, Instructions, and Drawings

The HNP procedures are used for periodic test and calibrations, special processes, modifications, maintenance, and other plant activities on safety-related systems, equipment or structures. New procedures and revisions to existing procedures are reviewed by plant personnel. This review is for compliance with provisions of the QA program, applicable codes, standards and regulations, inclusion of appropriate acceptance criteria and process controls. ~~Following the review, the procedures are reviewed by the PRB prior to being signed by a member of plant management.~~

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REV 3 7/85
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REV 13B 1/95
REV 14B 1/96

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Following this review, the procedures are reviewed by either a Qualified Reviewer or the PRB (see 17.2.1.2.2) prior to being signed by a member of plant management.

Written administrative procedures ensure proper control of instructions such as temporary procedure changes, standing orders, and night orders. These instructions are of limited scope and issued for limited time periods to ensure proper requirements included in the procedures are not bypassed or neglected.

Plant drawings reflect the properly reviewed and approved configuration of the plant. Changes as a result of design changes (subsection 17.2.3) or as-builts are controlled by written procedures the same as drawings until properly revised drawings are received. The design organization implements design control through written procedures.

17.2.5.2 Other Procedures

Each organization performing quality-related activities has properly reviewed and approved QA programs or procedures. These programs or procedures are reviewed for quality requirements and concurred with by the MSAER or his representative.

Examples of procedures include corporate nuclear support procedures.

17.2.6 DOCUMENT CONTROL

17.2.6.1 Procedure Changes and Control

Changes to HNP procedures fall into two categories: permanent changes and temporary changes. ~~On procedures that do not require immediate action, the change is prepared and presented to the PRB as set forth in administrative procedures (paragraph 17.2.5.1). After recommended approval by the PRB,~~ the appropriate member of plant management gives written approval prior to the change being implemented and incorporated in the appropriate section of the procedure. The proposed temporary changes that require immediate action to protect the safety of personnel or provide for protection of plant equipment require that the change be written, provided the intent of the original procedure is not altered and

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On procedures that do not require immediate action, the change is prepared and subsequently reviewed by either a Qualified reviewer or the PRB (see 17.2.1.2.2). Following recommended approval by the Qualified Reviewer/PRB (as appropriate),...