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June 5, 1981

OFFICIAL COPY



Georgia Power

the southern electric system

Power Generation Department

11 JUN 8 12:00

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 3100
101 Marietta Street, NW
Atlanta, Georgia 30303

REFERENCE:
RII: CEM
50-321/80-48
50-366/80-48

ATTENTION: Mr. James P. O'Reilly

Gentlemen:

In accordance with our May 22, 1981, conversation with Mr. Lenahan of your staff, we submit the following additional response to Inspection Reports 50-321/80-48 and 50-366/80-48:

For the buried piping backfill operation, seismic loads were not initially considered for the design of the temporary utility supports in view of the estimated short construction period and the low probability of seismic event occurrence. This information was miscommunicated to the NRC, which understood that seismic loads would be considered. In the Atlanta meeting between the NRC Region II, GPCo and Bechtel in January 1981, the NRC required that seismic loads be considered and the results of the analysis for various conditions be reported. The results of the seismic analysis were submitted to the NRC with the February, 1981 progress report. The analysis showed that the Class I buried piping satisfied the operability criteria (i.e., pressure + weight + DBE seismic stresses were less than the pipe yield stress) as well as equations 8 and 9 of NC 3600 of the ASME code.

The original conceptual design for excavating and backfilling of the buried piping called for buried pipes to be uncovered in 20 foot segments and in "checkered" or "hop-scotch" patterns. During the excavation, the contractor (SWP) suggested longer pipe segment exposures with temporary dead weight supports at 20 foot spans to expedite pipe rewinding and backfilling operations. This change was approved by the engineer (Bechtel) and construction continued. This change did not involve any change in the total scope of the DCR which was approved by the PRB nor did it raise any unreviewed safety questions and hence it was not submitted to the Plant Review Board for approval. Subsequently, plant procedure HNP-809 has been rewritten to more explicitly differentiate between changes affecting safety and those not affecting safety or the scope of the DCR. The determination of reportability to the PRB of changes to DCRs will be done by the cognizant engineer on a case-by-case basis. A general guideline for distinguishing reportable changes is not feasible.

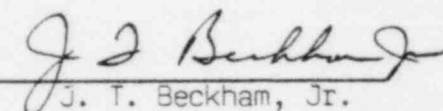
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We hope this information will clarify any questions concerning this matter. Please contact this office should further information be desired.

J. T. Beckham, Jr. states that he is Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that to the best of his knowledge and belief the facts set forth in this letter are true.

GEORGIA POWER COMPANY

By: 
J. T. Beckham, Jr.

Sworn to and subscribed before me this 5th day of June, 1981.

Notary Public

REB/mb

Notary Public, Georgia, State Seal
My Commission Expires Sept. 20, 1983

xc: M. Manry
R. F. Rogers, III