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USNRC REGION II
ATLANTA, GEORGIA

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August 10, 1981



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

REFERENCE:
RII: JPC
50-321/50-366
I&E Bulletin
80-08



ATTENTION: Mr. James P. O'Reilly

GENERAL:

During an inspection conducted by Mr. Lee Zajac of your staff on August 24-25, 1980, Hatch plant management committed to an attempt to radiograph the flued head type penetrations which are the subject of concern of I&E Bulletin 80-08, "Examination of Containment Liner Penetration Welds," issued August 7, 1980. Radiography was to be undertaken during the respective maintenance/refueling outages for each unit as stated in our letter to you dated November 3, 1980.

The following are the results of the radiograph examinations which were performed and the justifications for not performing radiography on the remaining penetrations:

1. The following Unit 2 penetrations were radiographed:

X8 - Primary Steam Condensate Drainage
X11 - HPCI
X17 - RPV Head Spray
X42 - Standby Liquid Control

No rejectable indications were observed.

2. The following Unit 2 penetrations were not radiographed:

X7A, B, C, & D - Primary Steam
X9A, B - Feedwater
X10 - RCIC
X12 - RHR Suction
X13A, B - RHR Return
X14 - RWCU
X36 - CRD Return
X16A, B - Core Spray

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3. Justifications for not performing radiography on the above-listed Unit 2 penetrations are as follows:

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- a. Penetrations X10 - RCIC and X14- RWCU had radiography performed on them during construction with no rejectable indications. Since the unit has been in service a relatively short time, the need to radiograph these penetrations again was not considered necessary.
- b. Penetration X36 - CRD Return was a spare penetration which has been capped due to the removal of the CRD Return line.
- c. Penetrations X7A, B, C, & D - Primary Steam and X13, B - RHR Return would require radiography using Cobalt 60. An in-depth study was performed at Georgia Power's request by Atlanta Testing and Engineering Company, the firm contracted to perform radiographic services, to determine the feasibility of using Cobalt 60 to perform the inspections. It was determined that the use of Cobalt 60 at 100 curies would result in the loss of the required sensitivity to detect the type indications which were of concern in the bulletin. Furthermore, it would require the evacuation of all personnel within a 900 ft. area to maintain a 2 mr/hr limit as required by state and federal regulations. Based on this information, it was decided that this method was too hazardous, and even if personnel safety was not considered, the results would likely be non-conclusive due to the loss of sensitivity using Cobalt 60.
- d. Penetrations X9A, B - Feedwater and X12 - RHR Suction could have been radiographed using Iridium 192 (IR192). Again using the results of the radiography firm's study, it was decided not to perform radiography on these penetrations. The study concluded that using IR192 to perform this activity would require film exposure times in excess of 120 hours or 12 ten-hour man-days per weld. It is our opinion that the excessive time required is sufficient justification for not performing radiography on those penetrations. The two basic reasons for these excessive film exposure times are the presence of water in the piping, which due to plant conditions could not be drained, and the thickness of the material which would have had to be overcome to get to the subject weld.
- e. An attempt was made to radiograph penetration X16A - Core Spray. After several hours of exposure no significant results had been obtained.

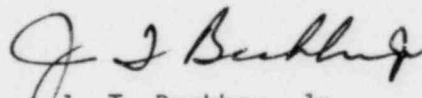
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Similar information as discussed in items 3b, c, d, and e above applies to Unit 1 with the exception of penetrations X17 and X42. Those particular penetrations had been radiographed during construction; however, it was decided that since the unit had been in service for a longer period of time than Unit 2, it would be beneficial to radiograph these penetrations to determine if any problems had occurred since initial startup. No rejectable indications were observed.

Radiographic exposures for the Unit 1 and Unit 2 flued head type penetrations which were examined during the respective maintenance/refueling outages are available for review at the plant site, along with letters from Atlanta Testing and Engineering Company explaining the source material and film exposure time for those penetrations not radiographed. The actions we have taken and the justifications given meet the intent of I&E Bulletin 80-08 and should require no further action by us.

If you have any questions in this regard, please contact this office.

Very truly yours,


J. T. Beckham, Jr.

JAE/mb

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