

Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 524-3195

Mailing Address:
40 Inverness Center Parkway
Post Office Box 1285
Birmingham, Alabama 35201
Telephone 205 868-5581

W. G. Hairston, III
Senior Vice President
Nuclear Operations

HL-949
000172

April 11, 1990

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

PLANT HATCH - UNIT 2
NRC DOCKET 50-366
OPERATING LICENSE NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
REMOVAL OF 3.25 LIMIT ON EXTENDING SURVEILLANCE INTERVALS

Gentlemen:

In accordance with the provisions of 10 CFR 50.90, as required by 10 CFR 50.59 (c)(1), Georgia Power Company (GPC) hereby proposes changes to the Plant Hatch Unit 2 Technical Specifications, Appendix A to Operating License NPF-5.

Specification 4.0.2 of the Plant Hatch Unit 2 Technical Specifications allows surveillance intervals to be extended up to 25 percent of the specified time interval. Specification 4.0.2 currently limits the combined time interval for any three consecutive surveillance intervals to less than 3.25 times the specified surveillance interval. On August 21, 1989, the NRC issued Generic Letter 89-14 which encouraged licensees to propose changes to plant Technical Specifications consistent with the guidance provided in the letter. The NRC concluded removing the 3.25 limit from Specification 4.0.2 results in a greater benefit to safety than limiting the use of the 25-percent allowance to extend surveillance intervals.

Consistent with the guidelines provided in Generic Letter 89-14, GPC proposes a revision to Unit 2 Technical Specification 4.0.2 to remove the 3.25 limit on extending surveillance intervals. This change will remove an unnecessary restriction on extending surveillance requirements, thereby resulting in a benefit to safety when plant conditions are not conducive to the safe conduct of surveillance requirements. The removal of the 3.25 limit will provide greater flexibility in the use of the provision for extending surveillance intervals, reduce the administrative burden associated with its use, and have a positive effect on safety.

9004230014 900411
PDR ADOCK 05000366
P PNU

A001
11

U.S. Nuclear Regulatory Commission
April 11, 1990
Page Two

Enclosure 1 provides a detailed description of the proposed change and the circumstances necessitating the change request.

Enclosure 2 details the bases for GPC's determination that the proposed change does not involve significant hazards considerations.

Enclosure 3 provides page change instructions for incorporating the proposed change into the Technical Specifications. The proposed changed pages for Unit 2 follow Enclosure 3.

To allow time for procedural revisions and orderly incorporation into copies of the Technical Specifications, GPC requests the proposed amendment, once approved by the NRC, be issued with an effective date to be no later than 60 days from the date of issuance of the amendment.

In accordance with the requirements of 10 CFR 50.91, a copy of this letter and all applicable enclosures will be sent to Mr. J. L. Ledbetter of the Environmental Protection Division of the Georgia Department of Natural Resources.

Mr. W. G. Hairston, III states he is Senior Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and to the best of his knowledge and belief, the facts set forth in this letter are true.

GEORGIA POWER COMPANY

BY: W. G. Hairston, III
W. G. Hairston, III

Sworn to and subscribed before me this 11th day of April 1990.

JKB/eb

Sherry Ann Mitchell
Notary Public

Enclosures:

1. Basis for Change Request
2. 10 CFR 50.92 Evaluation
3. Page Change Instructions

c: (See next page.)

MY COMMISSION EXPIRES DEC. 15, 1992

U.S. Nuclear Regulatory Commission

April 11, 1990

Page Three

c: Georgia Power Company

Mr. H. C. Nix, General Manager - Nuclear Plant

Mr. J. D. Heidt, Manager Engineering and Licensing - Hatch

GO-NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.

Mr. L. P. Crocker, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II

Mr. S. D. Ebnetter, Regional Administrator

Mr. J. E. Menning, Senior Resident Inspector - Hatch

State of Georgia

Mr. J. L. Ledbetter, Commissioner - Department of Natural Resources

ENCLOSURE 1

PLANT HATCH - UNIT 2
NRC DOCKET 50-366
OPERATING LICENSE NPF-5

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
REMOVAL OF THE 3.25 LIMIT ON EXTENDING SURVEILLANCE INTERVALS

BASIS FOR CHANGE REQUEST

PROPOSED CHANGE:

Plant Hatch Unit 2 Specification 4.0.2 currently limits the combined time interval for any three consecutive surveillance intervals to less than 3.25 times the surveillance interval. The proposed change removes the 3.25 limit on extending surveillance intervals.

BASIS FOR PROPOSED CHANGE:

This request complies with the NRC's recommendation transmitted in Generic Letter (GL) 84-14, "Line Item Improvements in Technical Specifications, Removal of the 3.25 Limit on Extending Surveillance Intervals dated August 21, 1989." In the letter, the NRC states that limiting the combined time interval for any three consecutive tests to 3.25 percent of the test interval is an unnecessary restriction and, therefore, recommends removing the 3.25 limit from Specification 4.0.2. Georgia Power Company's concurrence with the NRC's recommendation is based on the following points:

1. For tests performed during a refueling outage, the risk associated with removing the 3.25 limit is small compared to the negative impact of a forced shutdown. In GL 89-14, the NRC concluded the 3.25 limit is impractical. That is, the NRC has routinely granted one-time exceptions to the 3.25 on extending refueling surveillances, because, with each exception, the risk of continued operation was small compared to the risk of a forced shutdown to perform the surveillance.
2. For tests performed during power operation, a safety benefit can be gained by removing the 3.25 limit. The basis for allowing a 25-percent extension for a single test is improved safety. For example, plant safety is improved when a surveillance test can be delayed when plant conditions are not suitable for performing the test (i.e., transient plant operating conditions or conditions in which safety systems are out of service due to ongoing surveillance or maintenance activities. Because the 25-percent extension is justified on the basis of improved plant safety, limiting its use to the 3.25 limit has no basis.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
REMOVAL OF THE 3.25 LIMIT ON EXTENDING SURVEILLANCE INTERVALS

BASIS FOR CHANGE REQUEST

The intent of the 3.25 limit on extending surveillance intervals is to preclude routine use of the provisions for extending a surveillance interval by 25 percent. GPC does not intend that this Amendment be used as a convenience to allow surveillance intervals to be repeatedly extended beyond their specified interval for surveillances intended to be performed on a routine basis during plant operation.

ENCLOSURE 2

PLANT HATCH - UNIT 2
NRC DOCKET 50-366
OPERATING LICENSE NPF-5

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
REMOVAL OF THE 3.25 LIMIT ON EXTENDING SURVEILLANCE INTERVALS

10 CFR 50.92 EVALUATION

PROPOSED CHANGE:

Unit 2 Technical Specification 4.0.2 currently limits the combined time interval for any three consecutive surveillance intervals to less than 3.25 times the surveillance interval. The proposed change removes the 3.25 limit on extending surveillance intervals.

BASIS FOR PROPOSED CHANGE:

Georgia Power Company has evaluated the proposed amendment and determined it does not involve a significant hazards consideration, because:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Removing the 3.25-percent limit on extensions to surveillance intervals does not change the frequency of accident initiators or the consequences of any accidents previously evaluated. This amendment only affects the reliability of systems used to respond to accidents.

2. The possibility of a different kind of accident from any analyzed previously is not created by this change. No change in the design or function of any plant system or component will result from this revision.

3. The margin of safety is not significantly reduced by this change. The basis for this conclusion is as follows:

- a. For surveillance testing performed each refueling outage, the NRC recognizes this requirement (3.25 limit) is unnecessarily restrictive. In GL 84-14, the NRC concludes the risks involved in delaying a test up to 25 percent of the allowed 18 months are insignificant when compared to the negative impacts of a forced shutdown in order to perform testing.

- b. For surveillance testing performed during power operation, the margin of safety is improved by deleting the 3.25 requirement. The allowed 25-percent extension is already justified in the Technical Specifications on the basis of improved plant safety. Because each extension is justified on the basis of improved plant safety, denying the extension a second time merely because the conditions occur twice during three consecutive tests has no basis.