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Georgia Power

the southern electric system

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HL-3317
LCV-0014

Chief, Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Comment on "The Relocation of the Technical Specification Tables
on Instrument Response Time Limits"
(58 Federal Register 18118 of April 7, 1993)

Gentlemen:

Georgia Power Company has reviewed the proposed generic communication, "The Relocation of the Technical Specification Tables on Instrument Response Time Limits," published in the Federal Register on April 7, 1993. In accordance with the request for comments, Georgia Power Company provides the following.

- Enclosure 1 of the proposed generic communication states:

However, a footnote in the table of response time limits for the RTS states that neutron detectors are exempt from response time testing. To retain this exception, which is stated only in the table being removed from the TS, the surveillance requirements for the RTS should be modified to add the following statement:

Neutron detectors are exempt from response time testing. Each licensee that wishes to implement this line-item TS improvement should confirm that the plant procedures for response time testing include acceptance criteria that reflect the RTS and the ESFAS response time limits in the tables being relocated from the TS to the updated FSAR. The licensee should also provide a commitment to include the RTS and the ESFAS response time limits in the next update of the FSAR.

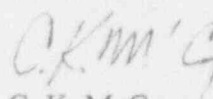
Although Enclosure 1 of the proposed generic communication states that the neutron detectors are exempt from response time testing, this point is not incorporated into the model technical specifications found in Enclosure 2. It is the position of Georgia Power Company that the exemption of neutron detectors from response time testing should be incorporated into the model technical specifications.

- Both Enclosures 1 and 2 of the proposed generic communication reference NUREG-0452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors"; therefore, the proposed generic communication appears to only apply to Westinghouse PWRs. However, basically the same requirements for response time testing appear in the BWR/4 Standard Technical Specifications, including the exemption for response time testing of the neutron detectors. Therefore, the proposed generic communication should, in addition to addressing response time testing for PWRs, address response time testing for BWRs as well.

Additionally, the BWR Owners' Group (BWROG) developed Topical Report NEDC-32013P, "System Analyses for Elimination of Selected Response Time Testing Requirements," and submitted it to the NRC for review and approval. This document provides the technical justification for the elimination of selected BWR Response Time Testing or Tests (RTT), as defined in Instrument Society of America (ISA) Standard S67.06, from plant technical specifications surveillance requirements. The analyses presented in NEDC-32013P concluded that surveillance and/or other techniques are adequate to detect failures that would be found during response time testing and the elimination of the selected BWR RTT will improve plant safety and reduce exposure to plant personnel. Operational improvements will also be realized by reducing unnecessary plant scrams, isolations, and safety system actuations and by reducing the diversion of plant personnel and resources for redundant testing. Georgia Power Company believes that the NRC should expedite the review and approval of Topical Report NEDC-32013P and eliminate unnecessary response time testing.

Should you have any questions, please advise.

Respectfully submitted,


C. K. McCoy

TWS/CKM

cc: Georgia Power Company

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