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W. A. Widner  
Vice President and General Manager  
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April 29, 1982



Director of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555



NRC DOCKET 50-366  
OPERATING LICENSE NPF-5  
EDWIN I. HATCH NUCLEAR PLANT UNIT 2  
REQUEST FOR CHANGE TO THE TECHNICAL SPECIFICATIONS

Gentlemen:

Pursuant to 10 CFR 50.90, as required by 10 CFR 50.59(c)(1), Georgia Power Company hereby requests a change to the Plant Hatch Unit 2 Technical Specifications, Appendix A to the Operating License. The proposed change would specify Limiting Conditions for Operation and Surveillance Requirements regarding inerting of the primary containment during power operation.

The requirement to inert is contained in Appendix R and Section 44 of 10 CFR Part 50. In order to facilitate the implementation of inerting, it is desirable to 1) bypass the high drywell pressure scram for a short time period and 2) obtain relief from the primary containment pressure specification for a like time period. Explanations and justifications are provided below.

The inerting or de-inerting process requires that the containment be slightly pressurized in order to purge the containment atmosphere. These pressure cycles, though small in magnitude, could be sufficient to exceed the setpoint of the high drywell pressure scram ( $\leq 2.0$  psig) and scram the reactor. To prevent unnecessary scrams and cycles on the reactor, we propose that the high drywell pressure scram be bypassed for a period not to exceed 72 hours while inerting or de-inerting. Revised page 3/4 3-5 is attached. Georgia Power Company proposes that this is acceptable for the short period of time involved due to the extremely low probability of occurrence of a LOCA with a zircaloy-water reaction during this time period. The high drywell pressure scram serves a backup function to the low reactor water level scram. The Unit 1 Technical Specifications contain a similar provision for the purpose of inerting or de-inerting.

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For the reasons explained above, Technical Specification 3.6.1.6, which specifies a primary containment pressure not to exceed 0.75 psig, may be exceeded during inerting or de-inerting. We propose relief from this specification for a like time period (72 hours) while inerting or de-inerting. Drywell pressures in excess of 0.75 psig will reduce the safety margin to containment design pressure for the design basis double ended recirculation pipe shear accident as described in Section 6.2 of the FSAR. However, we propose that this is acceptable due to the extremely low probability of this accident occurring during the short period of time necessary to inert or de-inert. Revised page 3/4 6-9 is attached.

The Plant Review Board and Safety Review Board have reviewed the proposed change and determined that it does not involve an unreviewed safety question. Probabilities of occurrence or consequences of accidents are not increased above those analyzed in the FSAR. No new modes of operation are introduced which would result in an accident of a different type than analyzed in the FSAR. Overall margins of safety are increased since the containment atmosphere will no longer support combustion. Unit 2 was initially licensed with redundant hydrogen recombiners for hydrogen control.

We have determined this to be a Class III amendment (see attachment), and have enclosed the appropriate payment.

W. A. Widner 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: W. A. Widner  
W. A. Widner

Sworn to and subscribed before me this 29th day of April, 1982

B. Baker

Notary Public

REB/mb Notary Public, Georgia, State at Large  
My Commission Expires Sept. 20, 1983

Enclosure

xc: H. C. Nix, Jr.  
R. F. Rogers, III  
J. P. O'Reilly (NRC-Region II)

ATTACHMENT 1

NRC DOCKET 50-366  
OPERATING LICENSE NPF-5  
EDWIN I. HATCH NUCLEAR PLANT UNIT 2  
REQUEST FOR CHANGE TO THE TECHNICAL SPECIFICATIONS

Pursuant to 10 CFR 170.22, Georgia Power Company has evaluated the attached proposed amendment to Operating License NPF-5 and has determined that:

- a. The proposed amendment does not require evaluation of a new Safety Analysis Report and rewrite of the facility license;
- b. The proposed amendment does not require evaluation of several complex issues, involve ACRS review, or require an environmental impact statement;
- c. The proposed amendment does not involve a complex issue or more than one environmental or safety issue;
- d. The proposed amendment does involve a single safety issue, namely inerting of the primary containment.
- e. The proposed amendment is therefore a Class III amendment.

ATTACHMENT 2

NRC DOCKET 50-366  
OPERATING LICENSE NPF-5  
EDWIN I. HATCH NUCLEAR PLANT UNIT 2  
REQUEST FOR CHANGE TO THE TECHNICAL SPECIFICATIONS

The proposed change to Technical Specifications (Appendix A to Operating License NPF-5) would be incorporated as follows:

Remove Page

3/4 5-5  
3/4 6-9  
-  
B 3/4 6-6

Insert Page

3/4 3-5  
3/4 6-9  
3/4 6-45  
B 3/4 6-6