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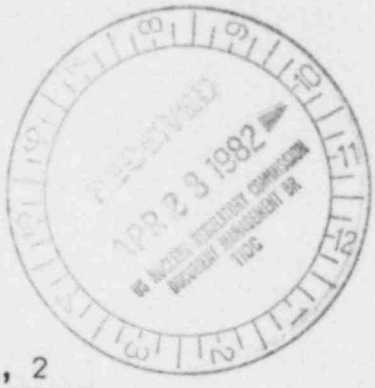
Georgia Power
the southern electric system

April 20, 1982

J. T. Beckham, Jr.
Vice President and General Manager
Nuclear Generation



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

NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2
POST TMI REQUIREMENTS IMPLEMENTATION SCHEDULE

Gentlemen:

Your letter of March 17, 1982, (Generic letter number 82-05) requested confirmation of completion or a schedule for completion for a number of requirements promulgated by NUREG-0737. Enclosure 1 to this letter responds to that request.

Implementation dates in Enclosure 1 have been estimated for those items still pending completion. In a November 4, 1981, letter we discussed our need for an extension of schedule for a number of these items. We stated in that letter that, in most cases, implementation was dependent upon equipment procurement and subsequent plant outages of sufficient length for installation. This restriction applies to the enclosed schedule, and in some cases conformance with the schedule may be precluded by factors beyond our control. Specific interim measures and considerations for the individual extension requests are noted were applicable.

Enclosure 2 provides an explanation of the requested extensions of schedule for implementation. We feel that flexibility in scheduling is justified by the nature of these enhancements, the interim alternatives provided earlier under the requirements of NUREG-0578, and the high cost in terms of resources and plant unavailability of one or more outages solely for the installation of equipment upon receipt.

In addition, the need for compliance with one item, II.E.4.2(7), is still a topic of discussion between the BWR Owners Group and the NRC staff. A date of compliance with the implementation criteria which result from those discussions cannot be made until further resolution is achieved.

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Georgia Power

If you should require further information concerning this response to your request, please contact this office.

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 20th day of April, 1982

Notary Public

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

REB/mb

Enclosure

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

Attachment to April 20, 1982 letter

Enclosure 1

IMPLEMENTATION SCHEDULE

ITEM	UNIT 1	UNIT 2
NUREG-0737	Estimated Completion Date	Estimated Completion Date
I.A.3.1 Simulator Exams	Complete 10-1-81	Complete 10-1-81
II.B.2 Plant Shielding	Complete 4-15-82	Complete 4-15-82
II.B.3 Post Accident Sampling	3-31-83	6-1-83
II.B.4 Core Damage Training	Complete 10-1-81	Complete 10-1-81
II.E.4.2(5) Pressure setpoint	Complete[1]	Complete[1]
II.E.4.2(7) Purge/Vent Isolation	Criteria pending negotiations	-
II.F.1(1) Noble gas monitor	3-31-83	9-30-82
II.F.1(2) Effluent Monitors	3-31-83	9-30-82
II.F.1(3) Containment Radiation Monitors	3-31-83	6-1-82[4,5]
II.F.1(4) Containment Pressure Monitor	3-31-83	6-1-82[4]
II.F.1(5) Containment Water Level Monitor	Complete[2]	Complete[2]
II.F.1(6) Hydrogen Concentration Monitor	Complete[2]	Complete[2]
II.K.3.15 HPCI/RCIC Modification	Complete 7-1-81	Complete 7-1-81
II.K.3.22 RCIC Suction Modification	3-31-83	12-31-82
II.K.3.24 HPCI/RCIC Space Cooling	Complete[1]	Complete [1]
II.K.3.27 Common Reference Level	Complete[3] 3-1-82	Complete[3] 3-1-82

[1]No modification required, original design satisfactory

[2]Equipment originally installed; under upgrade program of I&E Bulletin 79-01B

[3]Pending issuance of editorial changes to Technical Specifications

[4]Technical Specifications will be submitted, but approval schedule is beyond our control

[5]Equipment may be upgraded to environmental qualification requirement of 79-01B after parts received on site (see notes in enclosure 2)

Attachment to April 20, 1982 letter

ENCLOSURE 2

SCHEDULE EXPLANATION

II.B.3 - Post Accident Sampling

Unit 1:

Estimated Completion Date: March 31, 1983

a) Justification

NUREG-0737, Item II.B.3 directed the implementation of post-accident sampling capability by January 1, 1982. Georgia Power Company's response of December 15, 1980 committed to meet this requirement to the extent allowed by commerically available equipment.

We were not able to meet the NRC's implementation date of January 1, 1982 for the following reasons. The issuance of Regulatory Guide 1.97, Revision 2 imposed additional requirements on the post-accident sampling system, making it necessary to revise our specifications. This revision caused a significant delay in our system design. In addition, one of our suppliers experienced a work stoppage and was unable to deliver according the schedule.

b) Need

We hereby request an extension of the implementation deadline to the end of the refueling outage expected to begin in September 1982. All components and associated documentation are expected to be delivered by that time. Failure to receive such an extension will require a plant outage upon receipt of parts resulting in lost generation during the installation of components in areas inaccessible during normal operation.

c) Interim Compensatory Measures

A system composed of two components presently provides adequate sampling capability in the event of an accident during the interim period. One component consists of an interim reactor coolant sampling subsystem installed in response to NUREG 0578. The other component consists of the sampling station for drywell atmosphere which is used for such samples during normal operations. Under the source and shielding assumptions of NUREG 0737, this drywell atmosphere sample station can be used in a post accident environment.

Unit 2:

Estimated Completion Date: June 1, 1983

a) Justification

NUREG-0737, Item II.B.3 directed the implementation of post-accident sampling capability by January 1, 1982. Georgia

SCHEDULE EXPLANATION (Continued)

Power Company's response of December 15, 1980 committed to meet this requirement to the extent allowed by commercially available equipment.

We were not able to meet the NRC's implementation date of January 1, 1982 for the following reasons. The issuance of Regulatory Guide 1.97, Revision 2 imposed additional requirements on the post-accident sampling system, making it necessary to revise our specifications. This revision caused a significant delay in our system design. In addition, one of our suppliers experienced a work stoppage and was unable to deliver according to schedule. We were unable in our 1982 outage to complete all aspects of installation in areas which are inaccessible during operation due to lack of delivery of nuclear qualified solenoid valves. Another refueling outage will therefore be needed to complete installation.

b) Need

We hereby request an extension of the implementation deadline to the end of the refueling outage expected to begin in April 1983. All components and associated documentation are expected to be delivered by September 1982. Installation will be made at the first outage of sufficient duration (60-day planned or 120-day unplanned outage is considered of sufficient duration) should one occur after all parts are available. Failure to receive such an extension will require a plant outage upon receipt of parts resulting in lost generation during the installation of components in areas inaccessible during normal operation.

c) Interim Compensatory Measures

See Unit 1 discussion.

II.F.1(1) Noble Gas Monitor

Unit 1:

Estimated Completion Date: March 31, 1983

a) Justification

NUREG-0737, Item II.F.1.1 required the installation of high range noble gas effluent monitors. An implementation deadline of January 1, 1982 was given. Georgia Power Company's response of December 15, 1980 committed to meet this requirement to the extent allowed by commerically available equipment.

Georgia Power Company has attempted to implement this item according to the NUREG-0737 schedule. However parts and documentation for complete installation could not be obtained for an outage of sufficient duration prior to January 1, 1982.

b. Need

We hereby request an extension of the implementation deadline to the end of the refueling outage expected to begin in September 1982. All components and associated documentation are expected to be delivered by that time. An outage is required to install probes in plant effluent lines. Failure to receive such an extension will require a plant outage upon receipt of parts resulting in lost generation during the installation of these probes in areas inaccessible during normal plant operations.

c) Interim Compensatory Measures

Interim measures for quantifying high level releases and in-plant iodine have been implemented as described by our January 25, 1980 letter submitted in response to NUREG-0578.

Unit 2:

Estimated Completion Date: September 30, 1982

a) Justification

See Unit 1 discussion.

b) Need

Installation of equipment in normally inaccessible areas is being made during the current Unit 2 outage. However, certain equipment which can be installed during plant operation will not be available until later this year. A recorder, for example, is not expected to be delivered until June 1, 1982. Completion of implementation will be accomplished upon receipt of all materials. We hereby request an extension in implementation schedule to September 30, 1982.

c) Interim Compensatory Measures

See Unit 1 discussion.

II.F.1(2) Effluent Monitors

Unit 1:

Estimated Completion Date: March 31, 1983

a) Justification

NUREG-0737, Item II.F.1.2 required the installation of provisions for radioiodine effluent sampling at accident conditions. An

implementation deadline of January 1, 1982 was given. Georgia Power Company's response of December 15, 1980 committed to meet this requirement to the extent allowed by commerically available equipment.

Georgia Power Company has attempted to implement this item according to the NUREG-0737 schedule. However parts and documentation for complete installation could not be obtained for an outage of sufficient duration prior to January 1, 1982.

b) Need

We hereby request an extension of the implementation deadline to the end of the refueling outage expected to begin in September 1982. All componets and associated documentation are expected to be delivered by that time. An outage is required to install probes in plant effluent lines. Failure to receive such an extension will require a plant outage upon receipt of parts resulting in lost generation during the installation of these probes in areas inaccessible during normal plant operations.

c) Interim Compensatory Measures

Interim measures for quantifying high level releases and in-plant iodine have been implemented as described by our January 25, 1980 letter submitted in response to NUREG-0578.

Unit 2:

Estimated Completion Date: September 30, 1982

a) Justification

See Unit 1 discussion.

b) Need

Installation of equipment in normally inaccessible areas is being made during the current Unit 2 outage. However, certain equipment which can be installed during plant operation will not be available until later this year. A recorder, for example, is not expected to be delivered until June 1, 1982. Completion of implementation will be accomplished upon receipt of all materials. We hereby request an extension in implementation schedule to September 30, 1982.

c) Interim Compensatory Measures

See Unit 1 discussion.

SCHEDULE EXPLANATION (Continued)

II.F.1(3) - Containment Radiation Monitors

Unit 1:

Estimated Completion Date: March 31, 1983

a) Justification

NUREG-0737, Item II.F.1.3 required the installation of high-range containment radiation monitors by January 1, 1982. Georgia Power Company's response of December 15, 1980, committed to meet these requirements to the extent allowed by commercially available equipment.

Georgia Power Company has made every reasonable effort to implement this item according to the NUREG-0737 schedule, however, we found that it was impossible to meet the January 1, 1982 deadline. Parts and documentation necessary for a complete installation could not be obtained for an outage of sufficient duration prior to January 1, 1982. This was due to the limited number of suppliers, high demand, and long lead times for some of the necessary components.

b) Need

We hereby request an extension of the implementation schedule to the end of the refueling outage expected to begin in September 1982. All components and associated documentation are expected to be delivered before the beginning of that outage. Failure to receive such an extension will result in a plant outage and lost generation for installation of components in areas inaccessible during operation upon receipt of those components.

c) Interim Compensatory Measures

Sections 7.6.4.2 and 11.4.2.8.12 of the Unit 2 Final Safety Analysis Report describe the containment post accident gamma radiation monitors available on Unit 1 as an interim monitoring device.

Unit 2:

Estimated Completion Date: June 1, 1982

a) Justification

See Unit 1 discussion.

b) Need

Implementation of this item will be complete by June 1, 1982 with the possible exception of environmentally qualified cable connections at the gamma radiation detectors located in the primary containment. Parts necessary for the qualified connections are on order and are being expedited to the extent possible; however, receipt of these parts in time for installation during the current Unit 2 outage is questionable. If these parts are not received in time, Georgia Power Company proposes to temporarily utilize a connection method which is not qualified for an accident environment. These connections will be upgraded to 79-01B standards during the first outage of sufficient duration (60-day planned or 120-day unplanned outage is considered of sufficient duration) after all necessary parts are received on site, with the exception of submittals of Technical Specification revision.

c) Interim Compensatory Measures

Sections 7.6.4.2 and 11.4.2.8.12 of the Unit 2 Final Safety Analysis Report describe the containment post accident gamma radiation monitors available as an interim monitoring device.

II.F.1(4) Containment Pressure Monitor

Unit 1:

Estimated Completion Date: March 31, 1983

a) Justification

NUREG-0737, Item II.F.1.4 required the provision for continuous indication of containment pressure in the control room. The implementation deadline for this modification was January 1, 1982. Georgia Power Company's response of December 15, 1980 committed to meet these requirements to the extent allowed by commercially available equipment.

Georgia Power Company has made every reasonable effort to implement this item according to the NUREG-0737 schedule, however, we found that it was impossible to meet the January 1, 1982 deadline. Parts and documentation necessary for a complete installation could not be obtained for an outage of sufficient duration prior to January 1, 1982. This was due to the limited number of suppliers, high demand, and long lead times for some of the necessary components.

b) Need

We hereby request an extension of the implementation schedule to the end of the refueling outage expected to begin in September 1982. All components and associated documentation are expected to be delivered before the beginning of that outage. Failure to

receive such an extension will result in a plant outage and lost generation for installation of components in areas inaccessible during operation upon receipt of those components.

c) Interim Compensatory Measures

Drywell pressure is currently indicated on a recorder with a range of -5 to +80 psig which serves as an interim monitoring device.

Unit 2:

Estimated Completion Date: June 1, 1982

a) Justification

See Unit 1 discussion.

b) Need

We hereby request an extension of the implementation schedule to June 1, 1982. Installation of equipment in normally inaccessible areas is being made during the current Unit 2 outage. It is expected that implementation, with the exception of Technical Specification revision, will be complete prior to startup from the current outage. Technical Specification revision will be submitted for approval with similar Technical Specification revisions related to Post Accident Monitoring when all such instrumentation is installed.

c) Interim Compensatory Measures

Section 7.6.4.5 of the Unit 2 Final Safety Analysis Report describes the primary containment pressure monitor presently installed and available for use as an interim pressure indicator.

II.K.3.22 RCIC Suction Modification

Unit 1:

Estimated Completion Date: March 31, 1983

a) Justification

NUREG-0737 Item II.K.3.22 required that the switchover of reactor core isolation cooling (RCIC) from the condensate storage tank to the suppression pool be made automatic by January 1, 1982. Implementation of that modification requires the use of certain qualified level detection switches. The delivery of these switches is not anticipated until the fall of 1982.

SCHEDULE EXPLANATION (Continued)

b) Need

We hereby request an extension of the implementation deadline to the end of the refueling outage expected to begin in September 1982. All components and associated documentation are expected to be delivered by October 1982. Failure to receive such an extension will require a plant outage upon receipt of parts resulting in lost generation during the installation of components in areas inaccessible during normal operation.

c) Interim Compensatory Measures

Procedures exist for the manual transfer of RCIC suction as noted in our December 31, 1980 letter. Therefore, we believe that no significant risk to the public is created by this requested extension.

Unit 2:

Estimated Completion Date: December 31, 1982

a) Justification

See Unit 1 discussion.

b) Need

We hereby request an extension of the implementation deadline to December 31, 1982. All components and associated documentation is expected to be delivered by October 1982. Installation of equipment in normally inaccessible areas is being made during the current Unit 2 outage to the extent allowed by available parts. Installation will be made 60 days after all parts are available on site.

c) Interim Compensatory Measures

See Unit 1 discussion.