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August 20, 1990

the southern electric system

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

cket Nos. 50-424
50-425

ELV-01958

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

Gentleman:

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATION 4.0.3
24 HOURS TO COMPLETE AN INADVERTENTLY MISSED SURVEILLANCE

In accordance with the provisions of 10 CFR 50.90 and 10 CFR 50.59, Georgia Power Company (GPC) hereby proposes to amend the Vogtle Electric Generating Plant (VEGP) Units 1 and 2 Technical Specifications, Appendix A to Operating Licenses NPF-68 and NPF-81.

The proposed revision to Technical Specification 4.0.3 will make the wording of this section consistent with the wording proposed in Enclosure 2 of Generic Letter 87-09. GPC also proposes to revise the Bases to Section 4.0.3 with the proposed wording provided in Enclosure 3 of Generic Letter 87-09.

Enclosure 1 provides a description of the proposed change and the basis for the change request.

Enclosure 2 provides the basis for a determination that the proposed change does not involve a significant hazards consideration.

Enclosure 3 provides instructions for incorporating the proposed change into the Technical Specifications. The proposed revised pages are also provided in Enclosure 3.

In accordance with 10 CFR 50.91, the designated state official will be sent a copy of this letter and all enclosures.

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Mr. W. G. Hairston, III states that he is a Senior 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 and enclosures are true.

GEORGIA POWER COMPANY

By: W. G. Hairston, III
W. G. Hairston, III

Sworn to and subscribed before me this 20th day of August, 1990.

Sherry Ann Mitchell
Notary Public MY COMMISSION EXPIRES DEC. 15, 1992

WGH, III/JMG

Enclosures:

1. Basis for Proposed Change
2. 10 CFR 50.92 Evaluation
3. Instructions for Incorporation and Revised Pages

xc: Georgia Power Company

Mr. C. K. McCoy
Mr. G. Bockhold, Jr.
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Southern Company Services
Mr. L. B. Long

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebnetter, Regional Administrator
Mr. T. A. Reed, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

State of Georgia
Mr. J. L. Ledbetter, Commissioner, Department of Natural Resources

ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATION 4.0.3 24 HOURS TO COMPLETE AN INADVERTENTLY MISSED SURVEILLANCE

BASIS FOR PROPOSED CHANGE

Proposed Change

This proposed change to the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications will make the wording of Section 4.0.3 consistent with the wording proposed in Enclosure 2 of Generic Letter 87-09. This proposed change will also revise the Bases to Section 4.0.3 to reflect the proposed wording provided in Enclosure 3 of Generic Letter 87-09.

Basis

The wording of Section 4.0.3 currently states that the failure to perform a surveillance within the specified time interval shall constitute a failure to meet the Limiting Condition for Operation (LCO) Operability Requirements. Therefore, if a Surveillance Requirement is not met as a result of the failure to schedule the performance of the surveillance, the LCO would not be met and the Action Requirements must be complied with.

Generally, the Action Requirements include a specified time interval (i.e., allowable outage time limit) that permits corrective action to be taken to satisfy the LCO. When such a specified time interval is included in the Action Requirements, the completion of a missed surveillance within the time interval satisfies Specification 4.0.3.

Currently, some Action Requirements have outage time limits of only one or two hours and do not establish a practical time limit for the completion of a missed Surveillance Requirement. If a surveillance cannot be completed within these time limits, the LCO Action Statement would be entered. Even if the Action Requirements include remedial measures that would permit continued operation, they may be stated in such a way that they could prevent the performance of the required surveillance. A plant shutdown may also be required if the missed surveillance applies to more than the minimum number of systems or components required to be operable for operation under the allowable outage time limits of the Action Requirements. In this case, the individual specification or Specification 3.0.3 would require a shutdown.

If a plant shutdown is required before a missed surveillance is completed, it is likely that the surveillance would be conducted while the plant is being shut down since completion of a missed surveillance would terminate the shutdown requirement. This is undesirable since it increases the risk to the plant and public safety for the following two reasons:

ENCLOSURE 1 (CONTINUED)

VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATION 4.0.3 24 HOURS TO COMPLETE AN INADVERTENTLY MISSED SURVEILLANCE

BASIS FOR PROPOSED CHANGE

- a. The plant would be in a transient state involving changing plant conditions that offer the potential for an upset condition that could lead to a demand for the system or component being tested. This would occur when the system or component is either out of service to allow performance of the surveillance test or there is a lower level of confidence in its operability because the normal surveillance interval was exceeded. If the surveillance did demonstrate that the system or component was inoperable, it usually would be preferable to restore it to operable status before making a major change in plant operating conditions.
- b. A shutdown would increase the pressure on the plant staff to expeditiously complete the required surveillance so that the plant could be returned to power operation. This would further increase the potential for a plant upset condition since both the shutdown and surveillance activities place a demand on the plant operators.

It is overly conservative to assume that the systems or components are inoperable when a Surveillance Requirement has not been performed. The opposite is in fact the case; the vast majority of surveillances demonstrate that systems or components in fact are operable. When a surveillance is missed, it is primarily a question of operability that has not been verified by the performance of the required surveillance. Because the allowable outage time limits of some Action Requirements do not provide an appropriate time limit for performing a missed surveillance before shutdown requirements may apply, the TS should include a time limit that would allow a delay of the required actions to permit the performance of the missed surveillance.

This time limit should be based on considerations of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, as well as the safety significance of the delay in completion of the surveillance. GPC has concluded that, based on these considerations, 24 hours would be an acceptable time limit for completing a missed surveillance when the allowable outage times of the Action Requirements are less than this time limit of when shutdown Action Requirements apply. The 24-hour time limit will balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset condition and challenge to safety systems when the alternative is a shutdown to comply with Action Requirements before the surveillance can be completed.

References

- (1) United States Nuclear Regulatory Commission letter to All Light Water Reactor Licensees and Applicants, Generic Letter 87-09, June 4, 1987.

ENCLOSURE 2

VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATION 4.0.3 24 HOURS TO COMPLETE AN INADVERTENTLY MISSED SURVEILLANCE

10 CFR 50.92 EVALUATION

Pursuant to 10 CFR 50.92, Georgia Power Company (GPC) has evaluated the attached proposed amendment and has determined that operation of the facility in accordance with the proposed amendment would not involve significant hazards considerations. The change will modify the wording of the Technical Specification Section 4.0.3 and the Bases of Section 4.0.3 to be consistent with the guidance provided by Generic Letter 87-09. The basis for this determination is as follows:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change is administrative in nature consistent with the guidance provided in Generic Letter 87-09 and primarily serves to provide plant operating personnel with clearer guidance regarding compliance with LCO and Action Requirements under all operating modes. By allowing up to 24 hours to perform a missed surveillance, unnecessary plant transients that would be required by Action Statements would be reduced. This also would reduce potential challenges to safety systems required to function in the accident analysis.
2. The proposed change will not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change would not result in any physical alteration to any plant system, nor would there be a change in the method in which any safety related system performed its function. The proposed change serves to strengthen the existing Technical Specification requirements by eliminating some areas of confusion and interpretation, and providing a clear statement of the specification's intent. The change would not result in any equipment being operated in a manner different than that which it was designed to be operated.
3. The proposed change does not involve a significant reduction in a margin of safety. The proposed change serves to strengthen the philosophy of compliance with the Technical Specifications.

Based on the preceding analysis, GPC has determined that the proposed change to the Technical Specifications will not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. GPC therefore concludes that the proposed change meets the requirements of 10 CFR 50.92(c) and does not involve a significant hazards consideration.

ENCLOSURE 3

VOGTLE ELECTRIC GENERATING PLANT
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INSTRUCTIONS FOR INCORPORATION

The proposed change to the Vogtle Unit 1 and Unit 2 Technical Specifications would be incorporated as follows:

Remove Page

3/4 0-1* and 3/4 0-2
B 3/4 0-1a* and B 3/4 0-2

Insert Page

3/4 0-1* and 3/4 0-2
B 3/4 0-1a* and B 3/4 0-2
B 3/4 0-2a

* Overleaf page containing no change.