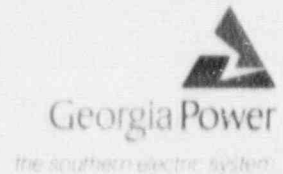


J. T. Beckham, Jr.
Vice President—Nuclear
Hatch Project



HL-1446
001312

April 12, 1991

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

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
GENERIC LETTER 88-01

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 Units 1 and 2 Technical Specifications (TS), Appendix A to operating Licenses DPR-57 and NPF-5, respectively.

The proposed amendment incorporates changes to the Plant Hatch Units 1 and 2 TS recommended in the NRC's February 16, 1990 Safety Evaluation Report addressing GPC's response to Generic Letter 88-01, "NRC Position on IGSCC Austenitic Stainless Steel Piping." Specifically, the amendment 1) modifies the TS regarding Plant Hatch's ISI program to include a statement of compliance with the NRC Staff position on inspections and 2) revises the reactor coolant system (RCS) leakage monitoring requirements.

Enclosure 1 provides detailed descriptions of the proposed TS changes and circumstances necessitating the change request. Enclosure 2 details the bases for our determination the TS proposed changes do not involve significant hazards considerations. Enclosure 3 provides page change instructions for incorporating the Unit 1 and Unit 2 proposed changes. The proposed changed TS pages for Unit 1 and Unit 2 follow Enclosure 3. Also included in Enclosure 3 are markups of the proposed Unit 1 and Unit 2 TS pages.

To allow time for procedure revisions and orderly incorporation into copies of the TS, 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.

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U.S. Nuclear Regulatory Commission

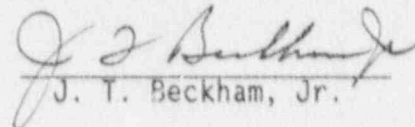
April 12, 1991

Page Two

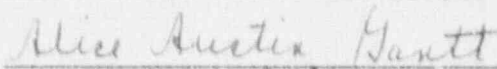
In accordance with the requirements of 10 CFR 50.91, a copy of this letter and all applicable enclosures will be sent to Mr. J. D. Tanner of the Environmental Protection Division of the Georgia Department of Natural Resources.

Mr. J. T. Beckham, Jr. states he is 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: 
J. T. Beckham, Jr.

Sworn to and subscribed before me this 11th day of April 1991.


Notary Public

MY COMMISSION EXPIRES APRIL 10, 1993

GKM/sp
001312

Enclosures:

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

c: Georgia Power Company

Mr. H. L. Sumner, General Manager - Nuclear Plant

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

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

Mr. K. Jabbour, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II

Mr. S. D. Ebner, Regional Administrator

Mr. L. D. Wert, Senior Resident Inspector - Hatch

State of Georgia

Mr. J. D. Tanner, Commissioner - Department of Natural Resources

ENCLOSURE 1

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
GENERIC LETTER 88-01

BASIS FOR CHANGE REQUEST

PROPOSED CHANGE ONE:

This proposed change revises the Unit 2 reactor coolant system (RCS) leakage monitoring Technical Specifications (TS) requirements to reflect the latest NRC positions. Unit 2 TS 3.4.4.3 has been modified to incorporate the requirements of an NRC Confirmatory Order dated July 8, 1983 and an NRC Safety Evaluation Report (SER) dated February 16, 1990. Specifically, limiting conditions for operation (LCOs) and surveillance requirements (SRs) associated with Unit 2 TS 3.4.3.1 (Leakage Detection Systems) and 3.4.3.2 (Operational Leakage) have been modified to reflect the Confirmatory Order, except where superseded by the February 16, 1990 SER.

Basis for Proposed Change One:

The Confirmatory Order modified the ACTION statement associated with Unit 2 TS 3.4.3.1 on leakage detection system operability. The Order required grab samples be taken every 4 hours (instead of every 24 hours) when either the primary containment atmospheric particulate radioactivity monitoring system or the primary containment gaseous radioactivity monitoring system is inoperable for up to 30 days. Subsequent to the order, the February 16, 1990 SER modified the 4 hour sample time as follows:

"... the staff has concluded that taking [reactor coolant system] RCS leakage measurements every 4 hours creates an unnecessary administrative hardship. Thus, RCS leakage measurements may be taken every 8 hours..."

Accordingly, this change will require the samples be taken every 8 hours. Similarly, channel or sensor checks on the leakage detection systems (SRs 4.4.3.1.a and 4.4.3.1.b) will be performed at least once per 8 hours. Similar changes are proposed for the SRs associated with RCS operational leakage (SRs 4.4.3.2.a and 4.4.3.2.b). The revised TS require monitoring floor and equipment sump levels and flow rates at least once per 8 hours, and monitoring the primary containment atmospheric particulate and gaseous radioactivity at least once per 8 hours. This 8-hour surveillance frequency is also justified by the February 16, 1990 NRC SER.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
GENERIC LETTER 88-01

BASIS FOR CHANGE REQUEST

Existing Unit 2 TS 3.4.3.2.b and 3.4.3.2.d specify a limit of 5 gpm unidentified RCS leakage and a 2 gpm increase in unidentified leakage, respectively. The February 16, 1990 NRC SER stated the 2 gpm increase in unidentified leakage should not be averaged over a 24-hour period. Therefore, conformance to the 2 gpm increase in RCS unidentified leakage will be achieved by comparing the latest reading of unidentified leakage to the three previous readings and assuring the increase has been less than 2 gpm. The proposed TS (3.4.3.2.d) will be modified to state "within a 24-hour period or less."

PROPOSED CHANGE TWO:

Unit 1 TS 3.6.G.1 (Reactor Coolant Leakage) and 3.6.G.2 (Leakage Detection Systems) will be modified to reflect the NRC's recommendations stated in the February 16, 1990 SER. Note that Amendment 93 changed the Unit 1 TS to incorporate NRC requirements relative to RCS leakage limits and detection systems; therefore, Unit 1 has no outstanding Confirmatory Order.

Basis for Proposed Change Two:

Unit 1 TS 3.6.G.1, which specifies permissible leakage limits, has been changed to reflect the NRC's position in the February 16, 1990 SER and will be consistent with the corresponding Unit 2 TS discussed under Proposed Change One. Specifically, Unit 1 TS 3.6.G.1.a (the 5 gpm unidentified RCS leakage limit) no longer specifies averaging over a 24-hour period. This TS will now be consistent with existing Unit 2 TS 3.4.3.2.b. Proposed Unit 1 TS 3.6.G.1.b (the 2 gpm increase limit) specifies the limit will not be exceeded "within a 24-hour period or less." As discussed above, this requires comparing the latest leakage reading with the three previous readings to assure any increase in unidentified leakage is less than 2 gpm. A minor wording change to existing Unit 1 TS 3.6.G.1.c was made, specifying total RCS leakage (identified and unidentified) shall not exceed 25 gpm averaged over "any 24-hour period" instead of "a 24-hour period." This change achieves consistency with existing Unit 2 TS 3.4.3.2.c.

Reactor coolant leakage requirements (SR 4.6.G) and the surveillance activity associated with the primary containment atmosphere particulate activity monitoring system, the primary containment radioiodine monitoring system, and the primary containment gaseous radioactivity monitoring system will be changed to "at least once per 8 hours," as opposed to "at least once per 4 hours," as specified currently. The basis for this change is the NRC SER discussed in Proposed Change One.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
GENERIC LETTER 88-01

BASIS FOR CHANGE REQUEST

PROPOSED CHANGE THREE:

This proposed change revises Unit 1 SR 4.6.K and Unit 2 SR 4.0.5 to include a paragraph stating the ISI Program for piping, covered by the scope of GL 88-01, is in conformance with NRC Staff positions on schedule, methods and personnel, and sample expansion, except where specific written relief has been granted by the NRC. Also, material in Unit 2 SR 4.0.5 referencing Section XI requirements prior to the start of commercial operation has been removed.

Basis for Proposed Change Three:

In the February 16, 1990 SER, which addresses GPC's response to GL 88-01, the NRC requested GPC revise the existing TS by including the requirement to perform ISI in accordance with GL 88-01 and the BWR Technical Specifications Improvement Program. Specifically, the SER revises the Plant Hatch ISI Program to be in conformance with NRC Staff positions (GL 88-01) on schedule, methods and personnel, and sample expansion, except where specific written relief has been granted by the Commission. Also, in GL 88-01, the NRC recognizes that in the future, the inservice inspection and testing sections of the TS may be deleted as part of the BWR Technical Specifications Improvement Program. If this occurs, the requirement will remain to reference GL 88-01 in an alternative requirements document.

A section of existing Unit 2 SR 4.0.5 references the 1974/Summer 1975 Addenda of the ASME Code, Section XI, which is no longer applicable and hence has been deleted. The remaining text, which covers the operational phase, is still applicable, since it references 10 CFR 50.55.(g).

ENCLOSURE 2

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
GENERIC LETTER 88-01

10 CFR 50.92 EVALUATION

PROPOSED CHANGED ONE:

This proposed change revises the Unit 2 reactor coolant system (RCS) leakage monitoring Technical Specifications (TS) requirements to reflect the latest NRC Staff positions. Unit 2 TS 3/4.4.2 has been modified to incorporate the requirements of an NRC Confirmatory Order dated July 8, 1983 and an NRC Safety Evaluation Report (SER) dated February 16, 1990. Specifically, limiting conditions for operation (LCOs) and surveillance requirements (SRs) associated with Unit 2 TS 3.4 3.1 (Leakage Detection Systems) and 3.4 3.2 (Operational Leakage) have been modified to reflect the Confirmatory Order, except where superseded by the February 16, 1990 SER.

Basis for Proposed Change One:

Georgia Power Company (GPC) has reviewed the proposed change and determined it does not involve a significant hazards consideration based on the following:

1. The proposed change does not significantly increase the probability or consequences of an accident previously evaluated. This change, which was made at the NRC's request, does not involve any physical modifications to the plant and does not affect the operation, maintenance, or testing of the plant. Revising the RCS leakage monitoring interval or reducing the averaging period for checking conformance to limits will not fundamentally change the method, or the fact that RCS leakage is checked on a frequent basis. For these reasons, this change does not significantly increase the probability or consequences of an accident previously evaluated.
2. The proposed change does not create the possibility of a new or different type of accident from any accident previously evaluated. Plant Hatch is analyzed for large, unisolatable leaks in the RCS; leakage is carefully monitored to reduce the probability of this occurring. Since no change is being made to the design, operation, maintenance, or testing of the plant, a new mode of failure is not created. Therefore, a new or different kind of accident will not occur as the result of this change.
3. The proposed change does not significantly reduce a margin of safety. Safety analysis assumptions and equipment performance are not changed, as reflected in the NRC SER dated February 16, 1990. RCS leakage will continue to be carefully monitored.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
GENERIC LETTER 88-01

10 CFR 50.92 EVALUATION

PROPOSED CHANGE TWO:

Unit 1 TS 3.6.G.1 (Reactor Coolant Leakage) and 3.6.G.2 (Leakage Detection Systems) will be modified to reflect the NRC's recommendations stated in the February 16, 1990 SER. Note that Amendment 93 changed the Unit 1 TS to incorporate NRC requirements relative to leakage limits and detection systems.

Basis for Proposed Change Two:

GPC has reviewed the proposed change (which is similar to Proposed Change One) and determined it does not involve a significant hazards consideration based on the following:

1. The proposed change does not significantly increase the probability of consequences of an accident previously evaluated. This change, which was made at the NRC's request, does not involve any physical modifications to the plant and does not affect the operation, maintenance, or testing of the plant. Revising the RCS leakage monitoring interval or reducing the averaging period for checking conformance to limits will not fundamentally change the method, or the fact the RCS leakage is checked on a frequent basis. For these reasons, this change does not significantly increase the probability or consequences of an accident previously evaluated.
2. The proposed change does not create the possibility of a new or different type of accident from any accident previously evaluated. Plant Hatch is analyzed for large, unisolatable leaks in the RCS; leakage is carefully monitored to reduce the probability of this occurring. Since no change is being made to the design, operation, maintenance, or testing of the plant, a new mode of failure is not created. Therefore, a new or different kind of accident will not occur as the result of this change.
3. The proposed change does not significantly reduce a margin of safety. Safety analysis assumptions and equipment performance are not changed, as reflected in the NRC SER dated February 16, 1990. RCS leakage will continue to be carefully monitored.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
GENERIC LETTER 88-01

10 CFR 50.92 EVALUATION

PROPOSED CHANGE THREE:

This proposed change revises Unit 1 TS 4.6.K and Unit 2 TS 4.0.5 to include a paragraph stating the ISI Program for piping, covered by the scope of GL 88-01, is in conformance with the NRC Staff positions related to schedule, methods and personnel, and sample expansion, except where specific written relief has been granted by the NRC. Also, obsolete material in Unit 2 TS 4.0.5 referencing Section XI requirements prior to the start of commercial operation has been removed.

Basis for Proposed Change Three:

GPC has reviewed the proposed change and determined it does not involve a significant hazards consideration based on the following:

1. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated. This change, which was made at the NRC's request, simply restates the wording of GL 88-01 relative to ISI. No changes to Plant Hatch ISI practices or methods are being made. This change does not involve any physical modifications to the plant and does not affect the operation, maintenance, and testing of the plant. Deleting the portion of existing Unit 2 TS 4.0.5, which reflected inservice inspection and testing requirements prior to commercial operation, will have no impact, since both units have been operating for several years and follow the applicable 10 CFR 50.55a(g) requirements. For these reasons, the response of the plant to previously evaluated accidents will remain unchanged.
2. The proposed change does not create the possibility of a new or different type of accident from any accident previously evaluated. Since no change is being made to the design, operation, maintenance, or testing of the plant, a new mode of failure is not created. Therefore, a new or different kind of accident will not occur as the result of this change.
3. The proposed change does not significantly reduce a margin of safety. Safety analysis assumptions and equipment performance are not changed, as reflected in the NRC SER dated February 16, 1990.

ENCLOSURE 3

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
GENERIC LETTER 88-01

PAGE CHANGE INSTRUCTIONS

The proposed changes to the Plant Hatch Units 1 and 2 Technical Specifications (Appendix A to Operating Licenses DPR-57 and NPF-5) will be incorporated as follows.

	<u>Page</u>	<u>Instruction</u>
UNIT 1:	3.6-7	Replace
	3.6-8	Replace
	3.6-10	Replace
UNIT 2:	3/4 0-2	Replace
	3/4 0-3	Replace
	3/4 4-5	Replace
	3/4 4-6	Replace