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(the southern electric system)

NED-83-117

February 22, 1983

Director of Nuclear Reactor Regulation  
Attention: Mr. John F. Stolz, Chief  
Operating Reactors Branch No. 4  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

NRC DOCKET 50-321  
OPERATING LICENSE DPR-57  
EDWIN I. HATCH NUCLEAR PLANT UNIT 1  
IMMEDIATE RELIEF FOR PRIMARY CONTAINMENT  
OXYGEN CONCENTRATION TECHNICAL SPECIFICATION

Gentlemen:

Pursuant to 10 CFR 50.90, as required by 10 CFR 50.59(c), Georgia Power Company proposes an amendment to the Unit 1 Technical Specifications (Appendix A to the Operating License).

Technical Specification 3.7.A.5.b requires "within the 24-hour period subsequent to placing the reactor in the RUN mode following a shutdown, the containment atmosphere oxygen concentration shall be reduced to less than 4% by volume and maintained in this condition". However, during the return to operation of February 22, 1983, it has become apparent that this Limiting Condition for Operation (LCO) cannot be met. Inability to meet the 24-hour LCO is due to time limits imposed on the use of the 18-inch containment purge and vent valves, as outlined in our letter to the NRC of October 1, 1982. This necessitates the use of 2-inch lines (bypass lines for the 18-inch valves) for containment purge and vent functions. These two-inch lines do not permit timely inerting of the containment. No other lines are available for containment purge and vent functions. Inerting commenced at about 7:00 p.m. (CST) on February 20, 1983, following last personnel entry into primary containment. We hereby request a one time extension of the 24-hour LCO to 72 hours. The 24-hour LCO interval began at about 9:00 a.m. (CST) on February 22, 1983.

The basis for the present 24-hour requirement on attaining a four percent oxygen concentration following entry into the RUN mode is to minimize the possibility of hydrogen combustion following a loss-of-coolant accident. The 24-hour period was established, as stated in the bases for

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specification 3.7.A.5, as being sufficient to perform necessary drywell inspections and establish the required oxygen concentration. The control is administrative and supplements the Containment Atmosphere Dilution (CAD) system, which can be used to control oxygen concentrations.

The CAD system provides the basis for assuring containment integrity post LOCA. Due to the license date for Unit 1, the CAD system was installed to meet the then applicable regulations addressing hydrogen evolution.

Because the 24-hour limit is an administrative control, as opposed to providing a safety function, margins of safety, as defined in the Technical Specifications, are not reduced by allowing a longer period of time to complete drywell inerting. The safety margin is provided by the CAD system.

Additionally, due to plant factors, maximum thermal power will not exceed fifty percent (50%) while oxygen concentrations exceed 4%.

Extension of the drywell inerting LCO also necessitates an extension of the LCO for Technical Specification 3.7.A.7.(1), Drywell-Suppression Chamber Differential Pressure, for a like time period. Required differential pressure cannot be established until inerting is completed as the containment vents are open during inerting.

The plant review board has reviewed the proposed change and determined that it does not constitute an unreviewed safety question. No new modes of plant operation are involved. As explained above, margins of safety are not reduced. Plant Hatch Unit 2 Technical Specifications currently allow 72 hours from the time thermal power exceeds 15 percent during startup to accomplish this inerting function.

This change is being requested on an expeditious basis. A subsequent submittal, including determination of amendment class and payment of applicable fees, will follow.

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G. F. Head 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: G. F. Head  
G. F. Head

Sworn to and subscribed before me this 22nd day of February, 1983.

Lyn C. Berzley  
Notary Public

Notary Public, Georgia, State at Large  
My Commission Expires July 26, 1985

REB/mb

Enclosure

xc: J. T. Beckham, Jr.  
H. C. Nix, Jr.  
Senior Resident Inspector  
J. P. O'Reilly, (NRC-Region II)