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June 21, 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 50-366  
OPERATING LICENSE NPF-5  
EDWIN I. HATCH NUCLEAR PLANT UNIT 2  
EXPEDITED RELIEF -- ADDITIONAL INFORMATION

Gentlemen:

As discussed in Georgia Power Company's (GPC) letter dated June 20, 1983, we request expedited attention to our request for Technical Specification relief from the requirement to have a GROUP 11 isolation to occur on a reactor water level low signal (LL1). The following additional information is submitted in support of that request.

The Plant Review Board has reviewed plant procedure HNP-2-10967 Revision 0, "Water Level Control During Feedwater Sparger Bracket Replacement and Reactor Vessel Inspection". This procedure, which is to be implemented upon approval of our proposed change to the Technical Specifications, provides for manual actuation of the automatic function which is being temporarily defeated while the bracket replacement and vessel inspection are in progress. The procedure requires, in the Prerequisites section, that no work is to be done which has the potential for draining the reactor vessel while work under this procedure is in progress. The procedure further requires that, as a minimum, one loop of RHR and one loop of Core Spray be available for injection into the reactor vessel should the need arise. This leaves one loop of RHR available for shutdown cooling which will not interfere with the capability of the other RHR loop to inject into the vessel. A data sheet which is part of the procedure requires recording of reactor water level every 15 minutes with appropriate action requirements should the level change. Two levels of action are provided. If a 10 inch drop in level occurs over a 15 minute period as recorded on the data sheet, level is to be restored by increased flow from the Control Rod Drive System. If level continues to drop to the -100 inch level, one loop of Core Spray is to be initiated. The procedure further calls for actions to be taken to protect personnel working in the reactor vessel in the event of any sudden increase in water level.

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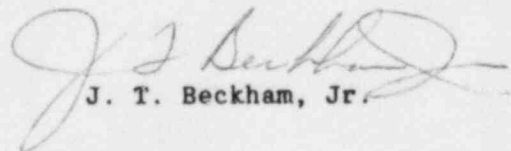
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In addition to the normal implementing procedure requirements Georgia Power Company will provide the following additional control measures during that period of time that the Group 11 isolation is not required for shutdown cooling on reactor water level low signal (LL1):

- Maintenance Requests (MR's) that are currently being worked on Unit 2 will be placed on hold and released after review by the shift supervisor to ensure that the work does not have the potential for draining the vessel.
- Quality Assurance (QA) personnel will independently observe that the requirements of the procedure are being met.

In our safety evaluation of the requested action under the requirements of 10 CFR 50.59 and 10 CFR 50.92, attention has been focused on the fact that the actions proposed will not increase the probability of a pipe break or malfunction of equipment that could cause a loss in reactor water level above that residual level which exists for any plant in the Cold Shutdown condition. On that basis we are able to state that the amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated. Inasmuch as the FSAR covers a spectrum of postulated breaks which cause water level to fall below the level at which we will take action, as stated above, the possibility of a new or different kind of accident has not been created. The availability of multiple sources of makeup water to the vessel in conjunction with the compensatory measures addressed in the procedure discussed above assures that margins of safety are being maintained and that this request does not involve a significant reduction in margins of safety.

Very Truly Yours

  
J. T. Beckham, Jr.

RDB/rb

xc: H. C. Nix, Jr.  
Senior Resident Inspector  
J. P. O'Reilly, (NRC-Region II)