

Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-7895

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

J. C. Causey
Vice President
Fossil and Hydro Generation



NED 83-358

June 20, 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
SHUTDOWN COOLING ISOLATION TECHNICAL SPECIFICATIONS
REQUEST FOR EXPEDITED RELIEF

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 an amendment to the Technical Specifications (Appendix A to the Operating License) for Plant Hatch Unit 2. Pursuant to 10 CFR 50.91, J. L. Ledbetter of the Georgia Department of Natural Resources will be sent a copy of this submittal. This application would amend the Unit 2 Technical Specification requirement for a Group 2 isolation on Reactor Water Level Low (LLL) during the remainder of the Unit 2 refueling/maintenance outage in order to facilitate necessary work on a feedwater support bracket.

The requirement for isolation of shutdown cooling on decreasing water level protects against a postulated pipe break accident. In theory, the postulated break could occur in the shutdown cooling system piping. Thus, given a water level low (LLL), the shutdown cooling system isolation valves are required to close. This scenario is only credible when the reactor is pressurized. In cold shutdown, with no activity in progress which has the potential for draining the reactor vessel, there is no forcing function to cause a pipe break in the shutdown cooling system.

Technical Specification Table 3.3.1-2 item 6 requires the isolation function to be operable in OPERATING CONDITIONS 3, 4, and 5. Table 3.3.2-2 item 6 requires the trip function to occur at greater than or equal to 12 1/2 inches water level.

8306270170 830620
PDR ADOCK 05000366
P PDR

ADD
1/1
Rec'd w/out check

Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555
June 20, 1983
Page 2

GPC proposes to remove the requirement to have a GROUP 11 isolation to occur on L11 while feedwater sparger bracket repair work is in progress. As discussed below, this proposed change is necessary in order to facilitate feedwater sparger work.

In the depressurized condition, even though there is no forcing function to cause a break, should the postulated pipe break occur in the shutdown cooling system lines, the required emergency low pressure cooling systems will be available and capable of maintaining the core covered. Thus, because the reactor is depressurized, the probability of occurrence of this postulated accident is not increased above that considered in the FSAR. Further, the FSAR contemplates several scenarios in which water level is allowed to drop below the level of the feedwater spargers with acceptable results. Therefore, the possibility of an accident not previously considered is not created by this action. Because the reactor is depressurized, the margins of safety against loss of water level through a postulated break in the shutdown cooling system piping are maintained. The Plant Review Board has reviewed the proposed change and has determined that it does not constitute an unreviewed safety question or a significant hazard as defined in 10 CFR 50.92.

In order to perform repair work on a feedwater sparger bracket, we have determined that it is necessary to lower the reactor water level to approximately three feet below the feedwater spargers to provide personnel access to the sparger bracket. It is our evaluation that this repair work can not readily be performed under water. The equipment to be used is not designed for under water use and would require modifications. The procedures would require revision in order to accommodate changes in testing of welds (dye penetrant test is presently called for). No qualified craft personnel are available for under water work. It would require approximately six weeks to mock up and test craft personnel on the procedures, revise procedures and modify equipment. In addition, it would be quite difficult to examine the repair work to ascertain that the repair work was acceptable.

We also expect man-rem's to be less if the repair is performed out of water. Due to the contribution of activity in the water itself and the increased length of time required to perform the repair, underwater repair would be expected to exceed 5 man-rem. Out of water repair, based on 20 man hours is expected to be less than 5 man-rem.

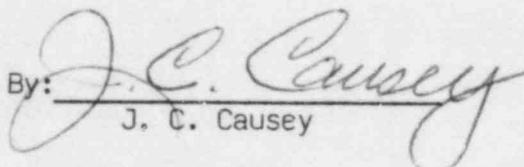
Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555
June 20, 1983
Page 3

Because this activity is on the critical path for unit startup, we believe this request qualifies for exemption from the 30-day prenotice requirement. We therefore request your expedited attention to this submittal. In view of our determination of no significant hazards consideration, and considering the potential effect on Unit 2 operation, we further request that this submittal be made exempt from a 30-day prenotice period.

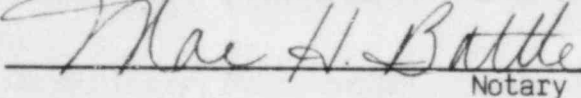
The proposed amendment has been evaluated and determined to be one Class III amendment. The determination of amendment class is attached. Due to the expedited nature of this request, the appropriate \$4,000.00 payment will be forwarded by a separate letter.

J. C. Causey 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. C. Causey

Sworn to and subscribed before me this 20th day of June, 1983.


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

RDB/mb

Enclosure

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