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C. K. McCoy
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Vogtle Project



September 12, 1994

LCV-0396-C

Docket Nos. 50-424
50-425

TAC Nos. M90119
M90120

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING
PROPOSED REVISION TO "Z" AND "S" FOR PRESSURIZER PRESSURE
REACTOR TRIP INSTRUMENTATION SETPOINTS.

By letter LCV-0396 dated June 24, 1994, Georgia Power Company requested a revision to the values of "Z" and "S" for pressurizer pressure instrumentation for the Vogtle Electric Generating Plant Technical Specifications. The change will allow the use of alternate types of pressure transmitters. In a telephone call on September 9, 1994, the NRC staff requested confirmation that the changes to the Technical Specifications and the use of Rosemount transmitters will remain conservative with the Allowable Values that are currently in the Technical Specifications. This confirmation is contained in the attachment to this letter.

Sincerely,

C.K. McCoy
C. K. McCoy

CKM/HWM/gmb

Enclosure

cc: (See next page)

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P PDR

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c(w): Georgia Power Company

Mr. J. B. Beasley, Jr.

Mr. M. Sheibani

NORMS

U. S. Nuclear Regulatory Commission

Mr. S. D. Ebnetter, Regional Administrator

Mr. D. S. Hood, Licensing Project Manager, NRR

Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

State of Georgia

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

ATTACHMENT

VOGTLE ELECTRIC GENERATING PLANT RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING PROPOSED REVISION TO "Z" AND "S" FOR PRESSURIZER PRESSURE REACTOR TRIP INSTRUMENTATION SETPOINTS.

The current Allowable Values in the Technical Specifications are more conservative than the possible allowable values that are allowed for use with the Rosemount Model 1154 Series H transmitters. By using Rosemount transmitters in the pressurizer pressure loops, the allowable value could have been adjusted closer to the applicable setpoints, yielding additional process operating range. However, it is not our intent at this time to replace all the pressurizer pressure transmitters with Rosemount models. Defining different setpoints and allowable values between otherwise identical instrument loops could lead to human performance errors. In our judgement, it is prudent to leave the allowable values as currently shown in Tables 2.2-1 and 3.3-3.

In Table 3.3-3, Functional Unit 9 describes Engineered Safety Features Actuation System Interlocks. Unit 9a covers pressurizer pressure interlock P-11. While TA, Z, and S are not provided for this interlock, an allowable value is. Similar to the reactor trip allowable value in Table 2.2-1, this allowable value could have been raised for pressurizer pressure loops using Rosemount transmitters. Again, to minimize the potential for error, the existing allowable value will be used for all pressurizer pressure loops, whether they use Tobar or Rosemount transmitters.

Taking full advantage of the improved Channel Statistical Allowance when using Rosemount transmitters, the table below shows the current and possible values. As can be seen from this table the current allowable values are more conservative than the possible allowable values.

	Description	Current Setpoint	Possible Setpoint	Current Allowable Value	Possible Allowable Value
1.	Low Pressure Reactor Trip	≥ 1960 psi	≥ 1955 psi	≥ 1950 psi	≥ 1947 psi
2.	High Pressure Reactor Trip	≤ 2385 psi	≤ 2390 psi	≤ 2395 psi	≤ 2398 psi
3.	Low Pressure Safety Injection	≥ 1870 psi	≥ 1830 psi	≥ 1856 psi	≥ 1838 psi
4.	ESFAS Pressurizer Pressure Interlock (P-11)	≤ 2000 psi	≤ 2005 psi	≤ 2010 psi	≤ 2013 psi