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J. T. Beckham, Jr.
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NED-83-267

April 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 DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2
REQUEST TO AMEND TECHNICAL SPECIFICATIONS-TMI ACTION PLAN ITEMS

Gentlemen:

Your letter of January 10, 1983 identified those TMI Action Plan Items which were scheduled to be implemented by December 31, 1981 and for which Technical Specification changes were required. Guidance was provided on the scope of specifications which the NRC staff would find acceptable, and sample pages in Standard Technical Specification format were provided for information purposes. Georgia Power Company (GPC) was requested to review Plant Hatch Units 1 and 2 Specifications to determine the degree of consistency with the staff guidance and to submit an application for license amendments found necessary.

GPC has completed the requested review and has determined the appropriate changes. In accordance with the provisions of 10 CFR 50.90, GPC hereby proposes amendments to the Edwin I. Hatch Units 1 and 2 Technical Specifications (Appendix A to the Operating Licenses). The specific changes requested are detailed in Enclosure 1 (Response to NRC staff guidance) and Enclosure 2 (instructions for incorporation of changes) of this letter.

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Application of the proposed Technical Specification changes would in no way constitute an unreviewed safety question as determined by the Plant Review Board and the Safety Review Board. The probability of occurrence and the consequences of an accident or malfunction of safety-related equipment would not be increased above those analyzed in the FSAR due to these changes because existing safety-related equipment operation is not affected. In addition, changes to support the RCIC system design modifications in response to items II.K.3.13 and II.K.3.22 improve the availability of a water supply to RCIC. The possibility of an accident or malfunction of a different type than analyzed in the FSAR would not result from those changes because the change in operational configuration of the RCIC system does not introduce a failure mode not previously analyzed in the FSAR, and the

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implementation of technical specifications regarding instrumentation installed in response to items II.F.1(1),(2),(3), and (4) will in no way affect operation of safety related systems or equipment. The margin of safety as defined in Technical Specifications would not be reduced by these changes because no non-conservative changes are proposed.

A determination of amendment class is included as Enclosure 3. We have determined these amendments to be Class IV for one unit and Class I for the other unit. The appropriate payment is enclosed.

J. T. Beckham, Jr. 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. T. Beckham, Jr.

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

William E. Burns

Notary Public

Notary Public, Georgia, State at Large
My Commission Expires Aug.26, 1986

JH/mb

Enclosure

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

ENCLOSURE 1

NRC DOCKETS 50-321, 50-366
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EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2
REQUEST TO AMEND TECHNICAL SPECIFICATIONS TMI ACTION PLAN ITEMS

Georgia Power Company (GPC) response to the NRC staff guidance provided in the January 10, 1983 letter is as follows:

STAFF GUIDANCE - STA TRAINING (I.A.1.1.3)

"Our July 2, 1980, letter provided model Technical Specifications (TSs) for TMI lessons learned Category "A" items. Included were TSs that specified the qualifications, training and on-duty requirements for the Shift Technical Advisors (STA). STA training requirements are under consideration by the Commission. Further guidance will be provided pending decision regarding engineering expertise on shift by the Commission".

RESPONSE

Unit 1 and 2 Administrative Technical Specifications require STA qualification, training, and shift coverage consistent with the guidelines provided in the July 2, 1980 letter.

STAFF GUIDANCE - LIMIT OVERTIME (I.A.1.3)

"On June 15, 1982 we transmitted to licensees a revised version of the Commission's Policy Statement on nuclear power plant staff working hours. In the same letter we also transmitted revised pages to NUREG-0737 (Item 1.A.1.3). The administrative section of the technical specifications should be revised to require procedures that follow the policy statement guidelines. An acceptable specification would be "the amount of overtime worked by plant staff members performing safety-related functions must be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12)," or following the model TSs in Enclosure 2".

RESPONSE

Proposed changes to Unit 1 and 2 Administrative Technical Specifications are included in Enclosure 2. The proposed changes would require administrative procedures for overtime limits in accordance with the guidelines of Generic Letter 82-12.

STAFF GUIDANCE - DEDICATED HYDROGEN PENETRATIONS (II.E.4.1)

"Plants that use external recombiners or purge/repressurization systems for post-accident combustible gas control of the containment atmosphere should provide containment penetrations dedicated to that service. The acceptable alternate is a combined design for use by either external recombiners or purge/repressurization systems and other systems which meet the requirements of Section 50.44 of 10 CFR Part 50. In satisfying this item, some plants may have to add some additional piping and valves. If so, these valves should be subjected to the requirements of Appendix J, and the TSs should be modified accordingly".

RESPONSE

No additional piping or valves were necessary in the Hatch units in response to this item. TS changes are therefore not necessary.

STAFF GUIDANCE - CONTAINMENT PRESSURE SETPOINT (II.E.4.2.5)

"The containment pressure setpoint that initiates containment isolation must be reduced to the minimum compatible with normal operating conditions. Most plants provided justification for not changing their setpoint and we approved their justifications by separate correspondence. The remaining plants have submitted a change to the TSs with the lower containment pressure setpoint. No further actions are required".

RESPONSE

Our submittal dated December 31, 1980 provided justification for not changing the containment pressure setpoint which initiates containment isolation. NRC approval of this position was granted by letters dated July 14, 1981 and December 16, 1981. No further action by GPC is considered necessary in response to this item.

STAFF GUIDANCE - CONTAINMENT PURGE VALVES (II.E.4.2.6)

"Model TSs are being sent separately to each plant as part of the overall containment purge and vent system review. Technical Specifications will be reviewed separately for each plant. In general, these TSs include the requirement that:

a. Containment purge or vent valves be locked closed if found not qualified for operation during a LOCA, and be verified locked closed at least every 31 days.

b. Containment purge or vent valves be used only when needed for safety related reasons.

c. Containment purge or vent valves with resilient seals be subjected to leakage testing and periodic resilient seal replacement.

Allowable time period in each year for purge/vent operation at each plant will be considered on a case-by-case basis".

RESPONSE

The need for changes to containment purge and vent valve specifications is currently being discussed by GPC and the NRC staff.

STAFF GUIDANCE- RADIATION SIGNAL ON PURGE VALVES (II.E.4.2.7)

"NUREG-0737 requires that containment purge and vent isolation valves must close on a high radiation signal to reduce the amount of radiation released outside containment following a release of radioactive materials to containment. The BWR Owners' Group has taken exception to this requirement and submitted their evaluation to NRC. NRC is currently reviewing the latest submittal of the Owners' Group. Technical Specifications for this item will be established after the technical resolution of this issue is completed".

RESPONSE

GPC is a participant in the BWR Owners' Group evaluation of this item.

STAFF GUIDANCE-REPORTING SV AND RV FAILURES AND CHALLENGES (II.K.3.3)

"NUREG-0660 stated that safety and relief valve failures be reported promptly and challenges be reported annually. The sections of your TSs that discuss reporting requirements should be accordingly changed; model TSs are given in Enclosure 2. Note that an acceptable alternative would be to report challenges monthly".

RESPONSE

Proposed changes to Unit 1 and 2 Administrative Technical Specifications are included in Enclosure 2. The proposed changes would require reporting of safety/relief valve failures and challenges in accordance with the model TSs.

STAFF GUIDANCE - RCIC RESTART AND RCIC SUCTION (II.K.3.13, II.K.3.22)

"The design of RCIC should be modified such that:

1. The system will restart on subsequent low water level after it has been terminated by a high water level signal;

2. RCIC system suction will automatically switchover from the condensate storage tank to the suppression pool when the condensate storage tank level is low.

Provide technical specifications for both of the above modifications. It could be included with other technical specifications for the RCIC system. Typical acceptable limiting conditions for operaton (LCO) and surveillance requirements, for instrumentation and system operational capability, are given in Enclosure 2".

RESPONSE

The RCIC Restart modification has been implemented in both Units 1 and 2. Proposed changes to Unit 1 and 2 RCIC Specifications are included in Enclosure 2. The proposed changes would require that the automatic restart logic be demonstrated operable as part of the simulated automatic actuation test.

The RCIC Suction Transfer modification has been implemented in Hatch Unit 1. Proposed changes to Unit 1 RCIC Specifications are included in Enclosure 2. The proposed changes would require that the automatic transfer logic be demonstrated operable as part of the simulated automatic actuation test and would impose surveillance requirements on the Condensate Storage Tank and Suppression Pool Level Switches. Changes to Unit 2 RCIC Specifications in response to this item will be proposed following implementation of the design change.

STAFF GUIDANCE - ISOLATION OF HPCI AND RCIC MODIFICATION (II.K.3.15)

"The pipe break-detection circuitry should be modified so that pressure spikes resulting from HPCI and RCIC system initiation will not cause inadvertent system isolation. The plants using a time delay relay for this modification should change their technical specification to include the time delay added by the relay in the isolation system instrumentation response time. The minimum and maximum expected response time should be provided as discussed in the sample TSs (in Enclosure 2).

The minimum expected response time is a plant specific value. The maximum expected response time should not be higher than seven seconds unless the licensee provides proper justification for selecting a higher response time. The plants which don't have isolation system response time in their Technical Specifications, should include the setpoint and the surveillance requirements on the time delay relay in the TSs".

RESPONSE

As discussed in our submittal dated January 7, 1982, time delay relays were used in Hatch Units 1 and 2 to make the required logic change.

Unit 1 Specifications do not currently include isolation system instrumentation response times; however, operability of the isolation logic is assured by logic system functional tests which are required by HPCI and RCIC Specifications to be performed once per operating cycle. These tests involve measurement of the time delay and calibration of the relay if the time delay is not within the allowable range.

Unit 2 Specifications include isolation system instrumentation response time as well as logic system functional test requirements. Proposed changes to Unit 2 Specifications for HPCI and RCIC high steam line flow isolation response time are included in Enclosure 2. The proposed changes would specify a minimum response time of three seconds, which is equal to the time delay of the relay. The previously specified maximum response time of 13 seconds was not increased by this modification and was justified in the January 7, 1982 submittal.

STAFF GUIDANCE - INTERLOCK ON RECIRCULATION PUMP LOOPS (II.K.3.19)

"Interlocks are required on nonjet pump plants (other than Humboldt Bay) to assure that at least two recirculation loops are open for recirculation flow for modes other than cold shutdown. This is to assure that the level measurements in the downcomer region are representative of the level in the core region.

Since there are very few plants affected by this modification and the change may be plant specific, we advise these plants to develop the technical specification and submit to the staff. The technical specification should include some surveillance requirements on the instrumentation and the corrective actions to be taken in case of instrumentation malfunction or failure".

RESPONSE

This item is not applicable to Plant Hatch.

STAFF GUIDANCE - COMMON REFERENCE LEVEL (II.K.3.27)

"All level instruments should be referenced to the same point. If a figure defining reactor vessel water levels is included in the Technical Specifications of your plant, it should be changed to reflect the common reference level established by this Action Plan Item. A sample figure is given in Enclosure 2".

RESPONSE

Unit 1 Figure 2.1-1 and Unit 2 Figure B 3/4.3-1 define reactor vessel water levels. In our TS amendment proposal dated March 10, 1982 a request was made to revise the Unit 2 figure to reflect the common reference level established in response to Item II.K.3.27. The Unit 1 figure, however, was inadvertently omitted. Included in Enclosure 2 is a proposed similar revision to the Unit 1 figure.

STAFF GUIDANCE - MANUAL DEPRESSURIZATION (II.K.3.45)

"Technical resolution of this Action Plan Item has just been completed. The staff will not require any modifications in plant design and operation. Therefore no changes to Technical Specifications will be required".

RESPONSE

No further action by GPC is considered necessary in response to this item.

ADDITIONAL ACCIDENT MONITORING INSTRUMENTATION (II.F.1(1),(2),(3),(4))

No staff guidance was provided for these items, which have been implemented in Units 1 and 2; however, GPC believes that the importance of these instruments to safety warrants their inclusion in Technical Specifications at this time. Proposed changes to Unit 1 Specifications for Instrumentation Which Provides Surveillance Information and Unit 2 Specifications for Accident Monitoring Instrumentation are included in Enclosure 2. The proposed changes would add requirements for operability of the high range effluent monitors and the high range containment radiation and pressure monitors.