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Georgia Power

the southern electric system

Power Generation Department

October 19, 1983

NED-83-516

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
DRYWELL EQUIPMENT DRAIN SUMP OPERABILITY

Gentlemen:

On October 18, 1983, Drywell equipment drain sump pump 2G11-C006B became inoperable at Plant Hatch, Unit 2. Since the redundant pump had previously failed, operability of the equipment sump and flow monitoring system (required by Technical Specification 3.4.3.1 b.) was lost. Since the reactor was in power operation, the ACTION statement for Technical Specification 3.4.3.1 was entered. This provides for up to 30 days of power operation with the equipment sump inoperable, provided that grab samples of the containment atmosphere are taken and analyzed. We intend to restore the equipment drain sump to operability during the 30 day LCO period. This letter, as a follow-up to a telephone conversation held October 18, 1983, between Georgia Power Company, NRC-Region II, NRC-NRR, and NRC-Plant Hatch, discusses: 1) Our methodology for evaluating unidentified and total leakage against the limits of Technical Specification 3.4.3.2, and 2) our inability to meet certain items of the Confirmatory Order issued July 8, 1983, concerning augmented reactor coolant leak detection.

The Hatch drywell equipment drain sump is designed to overflow into the floor drain sump. All sources of IDENTIFIED LEAKAGE accumulate in the equipment drain sump. UNIDENTIFIED LEAKAGE accumulates in the floor drain sump. Technical Specification 3.4.3.2 b limits UNIDENTIFIED LEAKAGE to 5 gpm. Prior to the equipment sump failure, this Technical Specification was complied with by measuring the amount of leakage pumped out of the floor drain sump. However, since the equipment drain sump overflow will collect in the floor drain sump, the floor drain sump is collecting both IDENTIFIED and UNIDENTIFIED LEAKAGE. Presently, this combined leakage is still below the 5 gpm Technical Specification limit for UNIDENTIFIED LEAKAGE. However, to assure continued operation until repairs can be made, and to assure that Technical Specification 3.4.3.2 b continues to be met, we propose that the average amount of equipment sump leakage (IDENTIFIED LEAKAGE) measured in the month of October be subtracted from the floor drain leakage in order to yield the UNIDENTIFIED LEAKAGE value. The average equipment sump leakage

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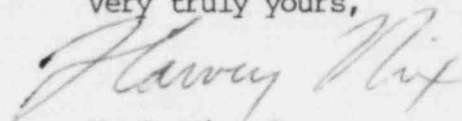
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Page 2

measured during October has been 1.94 gpm. Conservatively rounded to 1.9 gpm, this would allow a total of 6.9 gpm floor drain leakage to be measured, while retaining compliance with Technical Specification 3.4.3.2 b. If the leakage rate into the equipment drain sump increases, this figure would remain conservative. Any new increase in leakage to the floor drain sump will be assumed to be UNIDENTIFIED LEAKAGE. The Plant Review Board has reviewed this course of action and determined that it does not involve an unreviewed safety question.

In addition to Technical Specification requirements, we are operating under a Confirmatory Order issued July 8, 1983. This order described augmented leak detection requirements in regard to BWR recirculation pipe cracking. Several items of this order address operability of the drywell equipment sump. Item 7 of Attachment A to the Order requires operability of at least one of the leakage measurement instruments associated with each sump. This requirement cannot be met until the equipment sump is repaired. Additionally, Items 5 and 8 of Attachment A to the Order, which require increased frequencies for monitoring and channel checks of both the equipment and floor drain sumps, cannot be met since the equipment drain sump is inoperable. However, monitoring and channel checks of the still operable floor drain system should meet the intent of the order under the methodology we have described. Any change in observed leakage will be quickly detected before crack growth could progress. Any increase in total sump leakage over the 6.9 gpm limit will result in plant shutdown, whether it is IDENTIFIED or UNIDENTIFIED LEAKAGE. This represents a conservatism, since present Technical Specifications allow up to 25 gpm total leakage.

As discussed with you in our telephone conversation of October 18, 1983, we request your concurrence with our proposed course of action. Please contact this office if further information is required.

Very truly yours,



H. C. Nix, Jr.
Acting Vice President and
General Manager, Nuclear
Generation

REB/rb

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