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The Southern Electric System

R. P. McDonald
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ELV-02950
1043

Docket Nos. 50-424
50-425

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
REQUEST FOR REGIONAL WAIVER OF COMPLIANCE

This is a follow-up written request for a waiver of compliance for the Vogtle Electric Generating Plant - Units 1 and 2. On July 3, 1991, at approximately 2100 CDT, a one-time waiver from the requirements of Technical Specification (TS) 3.0.3 concerning the pressurizer pressure low pressure safety injection setpoint was requested by Georgia Power Company and granted verbally by NRC Region II and NRR personnel. This waiver allowed the TS 3.0.3 action requirement to place the plant in Mode 3 (Hot Standby) within 6 hours to be extended to 24 hours.

During a maintenance activity on one of the pressurizer pressure channels on Unit 2, it was discovered that a static head correction of approximately 25 psi was not required by the approved procedure and had not been applied during the calibrations of the pressure transmitters. An investigation showed this to be the case for all four pressurizer pressure channels on each unit. This correction factor affected the high pressurizer pressure reactor trip setpoint, the low pressurizer pressure reactor trip setpoint, the low pressurizer pressure safety injection setpoint, the initial pressure used in the pertinent safety analyses, and the pressure used in the calculation of the core limits as defined in the TS. Based on this and without further analysis, all four channels of pressurizer pressure instrumentation on each unit were declared inoperable, requiring entry into TS 3.0.3 at 1618 CDT on July 3, 1991.

Immediate consultation with Westinghouse personnel resulted in the conclusion that all non-LOCA events, steam generator tube rupture, large break LOCA, and TS core limits were acceptable considering the 25 psi bias. However, an evaluation of the small break LOCA analysis indicated that the 25 psi bias would be

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unacceptable due to the effect on the low pressurizer pressure safety injection signal. The setpoint assumed in the analysis for a small break LOCA includes environmental effects associated with adverse containment conditions (temperature and pressure) which are not expected during the early phase of a small break LOCA. These environmental effects (which are associated with conditions in containment from a large break LOCA or a steam line break) produced unacceptable results. Although worst case error assumptions lead to this conclusion, there are several considerations which mitigate the effect of environmental considerations on the small break LOCA. A small break LOCA will not generate the worst case adverse environmental conditions which result from a large break LOCA or a steam line break. Furthermore, the effect of the environmental error due to temperature would be delayed due to thermal lag and would not cause the total adverse impact on the transmitter response utilized in the setpoint study, since the small break LOCA analysis predicts reaching the low pressurizer pressure safety injection setpoint in less than one minute.

Based on the minimal safety significance of this condition as described above, a waiver of compliance was requested by Georgia Power Company in order to allow adequate time for recalibration of the transmitters to avoid an unnecessary shutdown of both units while the calibrations were in progress. In addition, as compensatory action, operators were instructed to manually initiate safety injection while the waiver of compliance was in effect, in the event that pressurizer pressure as indicated by any two channels reached 1900 psig following any reactor trip. Each licensed operator on both units acknowledged in writing these instructions. In light of the low probability of a small break LOCA, the conservatism involved in the worst case error assumptions, and the compensatory actions taken, Georgia Power Company believes that the 18 hour extension of the TS 3.0.3 action requirements was appropriate due to the minimal safety significance as discussed above.

As a result of this one-time waiver, the probability or consequences of any accident previously evaluated was not significantly increased nor was there any effect on the probability of occurrence of any initiating event. With the exception of the small break LOCA analysis, the results of the safety analyses were determined to be acceptable considering the 25 psi bias. The small break LOCA is a Condition III event with a low probability of occurrence. The low probability of the small break LOCA, the conservatisms involved in the worst case error assumptions, and the compensatory actions resulted in no significant increases in the consequences of any accident previously evaluated. The potential negative impact of unnecessarily shutting down both units was avoided. Therefore, the one-time waiver did not involve a significant hazards consideration. In addition, since the waiver did not alter the way in which the plant was operated, there were no adverse environmental effects involved.

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For both units, entry into TS 3.0.3 was made at 1618 CDT on July 3, 1991. All four channels of pressurizer pressure instrumentation on each unit were recalibrated by 0225 CDT on July 4, 1991. The action requirements of TS 3.0.3 were exited at 0348 CDT on July 4, 1991. Therefore, both units were under the action requirements of TS 3.0.3 for a period of 11 hours and 30 minutes which was well within the 24 hours allowed with the waiver. Furthermore, on Unit 1 three channels of instrumentation had been recalibrated by 0108 CDT on July 4, 1991 and on Unit 2 by 2230 CDT on July 3, 1991.

The Plant Review Board has concurred with the verbal waiver request and has reviewed and recommended approval of this follow-up request.

Sincerely,



R. P. McDonald

RPM/NJS/gmb

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