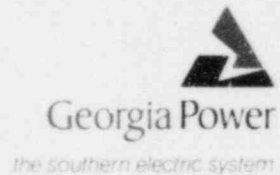


Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-6526

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

L. T. Gucwa
Manager Nuclear Engineering
and Chief Nuclear Engineer



NED-84-077

February 20, 1984

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
NUREG-0737 ITEM II.B.3, POST-ACCIDENT SAMPLING CAPABILITY

Gentlemen:

Our submittal dated January 26, 1984 provided information demonstrating the extent of compliance of Plant Hatch with the criteria of the subject item. A completion schedule was proposed for the criteria which were not yet satisfied. Mr. George Rivenbark, Hatch Licensing Project Manager, has requested additional justification for the proposed completion schedule. In response to that request, Enclosure 1 is submitted.

Please contact this office if there are any questions.

Very truly yours,

L. T. Gucwa

JH/tmw

Enclosure

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

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ENCLOSURE 1

EDWIN I. HATCH NUCLEAR PLANT UNITS 1 AND 2

POST-ACCIDENT SAMPLING CAPABILITY

I. INTRODUCTION

In our letter of January 26, 1984 we indicated four items remained outstanding concerning full completion of NUREG-0737 Item II.B.3. These items are discussed further below. Each of these four items can be characterized as relatively current problems. Initial commitments were based on the assumption operability of the Post-Accident Sample System (PASS) was all that was needed to satisfy the NUREG-0737 commitment. Other utility experience, site inspections, and the proposed technical specifications and formal program referenced by your Generic Letter 83-36 indicated a good deal more would be expected in the administrative aspects of this system. Two of the outstanding items relate specifically to these administrative aspects. The other two items concern questions on problems that did not fully develop until December, 1983.

II. SCHEDULE JUSTIFICATION

A. PROPOSED SCHEDULE - SHIPPING CASK

Criterion 8 of Item II.B.3 requires the capability to obtain and analyze (not necessarily on-site) grab samples as a backup if in-line monitoring is used for any analysis. Plant Hatch is in partial compliance with this criterion in that the PASS provides the capability to obtain grab samples to back up its in-line monitors and arrangements have been made for analysis at an off-site facility. The shipping cask which is to be used for transportation of the samples, however, will not be available until May 1, 1984. This date was proposed by GPC for completion of Criterion 8.

JUSTIFICATION

The cask in question was developed for the Pooled Inventory Management (PIM) program for use by numerous BWR utilities. GPC has therefore had minimal control over the schedule for design, construction, licensing, and delivery of the casks to the PIM facility. At the time the December 1, 1983 completion date for Item II.B.3 was proposed by GPC, the PIM casks were scheduled for delivery in late 1983. As late as November 21, 1983, GPC was informed that this schedule would be met. We discovered on January 24, 1984, however, that delivery had not been made and had been re-scheduled for May 1, 1984.

Had shipping cask availability been the only incomplete aspect of Item II.B.3, it is expected that alternate shipping arrangements could have been made. Furthermore, the probability of an accident requiring use of the PASS is extremely low, grab sample analysis would only be used as a backup to in-line monitoring, and limited grab sample analysis capability would be available on-site.

B. PROPOSED SCHEDULE - VALIDATION TESTING

Criterion 10 of Item II.B.3 specifies that the accuracy range, and sensitivity of the required isotopic and chemical analyses be adequate to provide pertinent data on the condition of the reactor coolant. Clarification 10 of the August 24, 1982 NRC letter provided specific accuracies which were to be achieved while performing the analyses in the presence of certain interferences (NRC test matrix). Plant Hatch partially satisfies Criterion 10 in that factory tests, performed using the NRC test matrix, resulted in accuracies which substantially complied with the recommendations of Clarification 10. However, a full system integrated test was not possible until site installation and initial operability were completed. To assure that the components and integrated system perform as designed a series of verification/validation tests are being carried out. GPC proposed May 1, 1984 as the completion date for this testing.

JUSTIFICATION

The integrated system tests could not be initiated until all system functions were established. Reliable pressure control and flow throughout the system were not available until the latter part of January 1984. Site verification tests and any necessary system refinements are in progress and will be completed by May 1, 1984.

C. PROPOSED SCHEDULE - ADMINISTRATIVE PROGRAM

Clarification 10 of the August 24, 1982 NRC letter specifies that equipment testing, procedures for sampling and analysis, and personnel training be adequate to ensure the availability of post-accident sampling and analysis capability. It was noted that forthcoming model Technical Specifications would provide guidance on the incorporation of these provisions. The referenced guidance was provided in Generic Letter 83-36, dated November 1, 1983. This letter transmitted a model Technical Specification which required an administrative program covering personnel training, maintenance of sampling and analysis equipment, and procedures for sampling and analysis. GPC proposed to implement such a program by June 1, 1984.

JUSTIFICATION

Based on Generic Letter 83-36 it was apparent that a formal administrative program would be required. This administrative program needs to address surveillance, calibration, procedures training, retraining, operability criteria, staffing (i.e. who is trained), etc. While initial training, calibration, procedural development, and related functions have been accomplished, the establishment of a formal ongoing program is not yet complete. Technical Specification and Program development will be completed by June 1, 1984.

D. PROPOSED SCHEDULE - HEAT TRACING

Criterion 11 of Item II.B.3 requires that consideration be given to various aspects of equipment design related to representative sampling. Clarification 11 of the August 24, 1982 NRC letter specifically mentions heat tracing as an item to be addressed. Plant Hatch partially complies with Criterion 11 in that the PASS design includes all of the required considerations with the exception of heat tracing on the containment atmosphere sample lines. GPC proposed to install the heat tracing by August 1, 1984.

JUSTIFICATION

Heat tracing was not a specific design criterion in the initial discussion of this item. It was recognized that the containment atmosphere sample must be representative for noble gases and radioiodines. Initial engineering analyses indicated heat tracing was not needed to assure sample validity. While subsequent analyses do not clearly indicate heat tracing is either needed or not needed, it was decided that installation would be necessary to remove any doubt about sample validity. Heat tracing has been designed and is in the procurement process. The current schedule calls for installation by August 1, 1984.

III. CONCLUDING SUMMARY

As stated in our January 26, 1984 submittal, the PASS system is fully functional. All components are operating. The four outstanding items discussed need to be completed, however, before GPC can state that Plant Hatch is in full compliance with NUREG-0737 criteria for Post-Accident Sampling Capability.