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USNRC REGION II
ATLANTA, GEORGIA

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Georgia Power

the southern electric system

NED-83-580

November 18, 1983

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
101 Marietta Street, NW
Atlanta, Georgia 30303

REFERENCE:
RII: JPO
50-321/50-366
I&E Bulletin
80-08

ATTENTION: Mr. James P. O'Reilly

Gentlemen:

NRC I&E Bulletin 80-08, issued April 7, 1980, requested information concerning flued head type penetration connections. Georgia Power Company (GPC) has made submittals on July 7, 1980, August 5, 1980, November 3, 1980, and August 10, 1981 in response to the subject bulletin.

We respond herein to a concern raised by Mr. J. L. Coley of your staff during site inspections conducted March 2-5 and March 16-19, 1982 (Reference: Report nos. 50-321/82-08 and 50-366/82-08). His concern was directed at the fact that no exception to performing radiography on Hatch Unit 1 flued head type penetrations could be found. He requested that the site resolve this concern.

In an effort to resolve Mr. Coley's concern, an in-depth search by site personnel of all available construction records was initiated. This search proved to be unsuccessful in producing the deviation to the required radiography for the Hatch Unit 1 flued head type penetrations. GPC's architectural engineers, engineering, and licensing personnel were requested to review their records for any such deviation from the required NDE. No deviation to the required radiography was found by the aforementioned off-site parties.

Although no formal request for deviation from the required NDE can be found, GPC is confident that no problems such as that described in the subject I&E Bulletin exists on either Hatch unit based on the following:

1. Although radiography was not performed as required, some other form of NDE examinations (e.g., surface examination, ultrasonics) were performed.

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2. Integrated leak rate test (ILRT) results have shown that no leakage has occurred as a result of the problems mentioned in the bulletin.
3. During the years of operation for both Hatch units, no problems of the nature described in the bulletin have been observed.

By letter dated August 10, 1981, GPC sent the NRC, as a result of prior concerns, a list of flued head type penetrations that would require radiography if it should be required along with justification why such examinations should or could not be performed. The subject letter also indicated that attempts had been made to radiograph several flued head type penetrations. The results of the attempted radiography showed either no defects or no meaningful results achieved dependent upon the penetration examined.

Based on the information contained herein, GPC has made a conscientious effort toward resolving NRC's concerns associated with I&E Bulletin 80-08. In addition, it is our opinion that any further actions (i.e., radiography of the flued head type penetrations) would not be productive and should not be attempted due to safety or other justifiable concerns as discussed in our August 10, 1981 letter.

Should you have any questions or comments in this regard, please contact this office.

Sincerely yours,



L. T. Gucwa

JAE/mb

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