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the southern electric system

NED-84-253

June 1, 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. K. 3. 16, REDUCTION OF
CHALLENGES AND FAILURES OF RELIEF VALVES

Gentlemen:

In response to your letter of April 12, 1984, Georgia Power Company (GPC) provides the following information on Plant Hatch implementation of the subject TMI action plan item. Numbering below corresponds to questions posed in your letter.

- (1) Which, if any, of the staff recommended modifications have been implemented?

RESPONSE:

Staff recommendation #1, Low-Low Set (LLS) relief logic, has been implemented on Unit 2. LLS relief logic will be implemented on Unit 1 during an outage scheduled to begin in September, 1984. Unit 2 Technical Specification revisions and related technical details were sent to the NRC in submittals dated February 23, 1983, and April 19, 1983. Similar changes for the Unit 1 Tech Specs will be submitted in conjunction with the modifications to Unit 1.

Staff recommendation #2, lowered water level setpoint for MSIV closure from Level 2 to Level 1, was implemented on Unit 2 in conjunction with LLS relief logic modifications. Modifications to Unit 1 will be implemented in conjunction with the LLS relief logic modifications during an outage scheduled to begin in September, 1984.

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Staff recommendation #3, increased simmer margin, is not currently being considered. We believe Plant Hatch has adequate simmer margin and further increase is not justified.

Staff recommendation #4, preventative maintenance program, has been implemented through servicing of the Safety Relief Valves (SRVs) by Target Rock Corporation during periodic recertification of the valves at Wyle Labs. Target Rock procedures for SRV maintenance are periodically revised to be current with Service Information Letters (SILs), recommendations from the Target Rock technical staff, and requirements of NRC Bulletins.

- (2) Which, if any, of the staff recommended modifications you propose to implement.

RESPONSE:

All staff recommended modifications except #3, (increased simmer margin) will be implemented as discussed in the response to your question #1.

- (3) Whether you have implemented or propose to implement any of the other modifications or actions discussed in NUREG-0737, Item II. K. 3. 16 or in the BWR Owners Group (BWROG) report.

RESPONSE:

Of the thirteen modifications listed in NUREG-0737 Item II. K. 3. 16, GPC has concluded that none are appropriate for Plant Hatch. GPC participated in the BWROG evaluation described in the report BWROG-8134 dated March 31, 1981. GPC has implemented or plans to implement the following recommendations from the BWROG report: (numbering corresponds to that of the report)

- (1) (a) Lowered RPV water level isolation setpoint for MSIV closure from Level 2 to Level 1: modifications are described in our response to your question #1.
- (3) (a) Low-Low Set (LLS) relief logic system: modifications are described in the response to your question #1.
- (4) (a) Analog trip transmitter system (ATTS) will be implemented on Unit 2 during the current outage, and on Unit 1 during an outage scheduled to start in September, 1984. Revisions to the Unit 2 Technical Specifications and supporting technical information were sent to the NRC in a submittal dated January 23, 1984. Similar revisions for Unit 1 will be submitted in conjunction with the Unit 1 modifications.

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- (4) (c) Reduce isolations caused by surveillance testing: Implementation of the ATTS is expected to reduce spurious trips and isolations due to surveillance testing and other causes.
- (6) Control of pneumatic supply pressure to SRVs: GPC has implemented the following improvements to the drywell pneumatic system: 1) revised setpoint for an existing low pressure alarm to alert the operator to loss of pneumatic supply to the SRVs, 2) installed a high pressure alarm to alert operators to excessive pneumatic supply pressure which could cause misoperation of the SRVs, and 3) installed a relief valve on the drywell pneumatic supply to ensure that the maximum allowable pressure will not be exceeded.

Additional piping modifications are being implemented to improve the reliability of the long term pneumatic supply to the SRVs. These modifications will be installed during the current Unit 2 outage, and during the Unit 1 outage scheduled to begin in September, 1984.
- (7) Use of Target Rock two-stage SRVs: Unit 1 was converted from three-stage to two-stage SRVs in 1978. Unit 2 had two stage SRVs installed during construction.

Please contact this office if you have any questions or comments.

Very truly yours



L. T. Gicwa

PLS/

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