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Georgia Power
the southern electric system

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LCV-0679

Docket Nos. 50-424
50-425

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

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
TO ALLOW TYPE B AND C TESTS FOR REFUELING OUTAGE 1R6
TO BE CONDUCTED IN ACCORDANCE WITH 10 CFR APPENDIX J OPTION B

Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Georgia Power Company proposes to amend the Vogtle Electric Generating Plant (VEGP) Unit 1 Technical Specifications. The proposed change will add a footnote to specification 4.6.1.2.d stating that the type B and C tests scheduled for refueling outage 1R6 will be conducted in accordance with Option B of 10 CFR 50 Appendix J, and using the guidance of Regulatory Guide 1.163, Revision 0.

Appendix J of 10 CFR 50 has recently been revised to include Option B. This Option allows the implementation of a performance based type B and C testing program. This Option is being incorporated into Georgia Power Company's request to implement the Improved Technical Specifications. The Improved Technical Specifications are not scheduled to become effective until after the Unit 1 refueling outage 1R6, currently scheduled for March 10 through April 19, 1996. The type B and C testing program is being revised to comply with the requirements of Option B and will be ready for implementation during refueling outage 1R6. This revision to the Unit 1 Technical Specification will allow Option B for type B and C tests to be applied at 1R6. After 1R6, the Improved Technical Specifications are expected to be in effect, which will include the application of Option B to both VEGP Units 1 and 2.

This is a cost beneficial licensing action. Approval of this request will allow the cost savings, estimated at about \$50,000 to be realized during 1R6. Therefore, GPC requests that this revision to the Technical Specifications be approved by January 31, 1996.

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The basis for the proposed Technical Specifications change is provided in Enclosure 1. The supporting significant hazards evaluation pursuant to 10 CFR 50.92 is provided in Enclosure 2. Based upon the analysis provided, Georgia Power Company (GPC) has determined that the proposed changes to the technical specifications do not involve a significant hazards consideration as defined by 10 CFR 50.92. Georgia Power Company has determined that the proposed license amendment will not significantly affect the quality of the environment. The marked up page of the Technical Specifications and instructions for incorporation are in Enclosure 3.

A copy of the proposed change is being sent to Mr. J. D. Tanner, the Georgia State Designee, in accordance with 10 CFR 50.91(b)(1).

Mr. C. K. McCoy states he is vice president of GPC, is authorized to execute this oath on behalf of GPC, and to the best of his knowledge and belief, the facts set forth in this letter are true.

GEORGIA POWER COMPANY

By: C. K. McCoy
C. K. McCoy

Sworn to and subscribed before me this 16th day of October, 1995.

Mary N. Bentley
Notary Public

My Commission Expires: May 9, 1999

CKM/HWM

LCV-0679

Enclosures

1. Basis for Change Request
2. 10 CFR 50.92 Evaluation
3. Hand-Marked Pages

cc: Georgia Power Company

Mr. J. B. Beasley, Jr.

Mr. M. Sheibani

NORMS

U. S. Nuclear Regulatory Commission

Mr. S. D. Ebnetter, Regional Administrator

Mr. L. L. Wheeler, Licensing Project Manager, NRR

Mr. C. R. Ogle, Senior Resident Inspector, Vogtle

State of Georgia

Mr. J. D. Tanner, Commissioner, Department of Natural Resources

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ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS TO ALLOW TYPE B AND C TESTS FOR REFUELING OUTAGE 1R6 TO BE CONDUCTED IN ACCORDANCE WITH 10 CFR APPENDIX J OPTION B

DESCRIPTION OF CHANGE AND BASIS FOR CHANGE REQUEST

Proposed Change

Technical specification 4.6.1.2.d currently states the following:

"Type B and C tests shall be conducted with gas at a pressure not less than P_a , 37 psig, at intervals no greater than 24 months* except for tests involving:

- 1) Air locks and
- 2) Purge supply and exhaust isolation valves with resilient material seals."

The footnote associated with this specification states:

"*The Type C test interval for Unit 1 valves HV-1974 (and associated check valve 1-1217-U4-113), HV-1975, HV-1978, and HV-1979 may be extended to prior to entry into Mode 4 following the next scheduled refueling outage (or the next forced outage requiring entry into Mode 5), but no later than November 1, 1994."

The proposed change will eliminate the footnote because its applicability date is expired and replace it with a footnote that states:

"The type B and C tests scheduled for refueling outage 1R6 will be conducted in accordance with Option B of 10 CFR 50 Appendix J, using the guidance of Regulatory Guide 1.163, rev. 0."

Basis for Change

The NRC has reviewed its regulations in an effort to determine which regulations might be revised to reduce the regulatory burden on licensees without significantly impacting nuclear safety. That review suggested that 10 CFR 50, Appendix J would be a primary candidate for reducing the regulatory burden. Consequently, the NRC has revised 10 CFR 50, Appendix J to provide a performance-based option for determining the test frequency for the containment structure, electrical penetrations, and isolation valves. That provision for the conduct of Type A integrated leak rate testing (ILRT) and Type B and Type C local leak rate testing (LLPT) on a performance-based frequency is designated by the revised Appendix J, as Option B.

ENCLOSURE 1 (CONTINUED)

VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS TO ALLOW TYPE B AND C TESTS FOR REFUELING OUTAGE 1R6 TO BE CONDUCTED IN ACCORDANCE WITH 10 CFR APPENDIX J OPTION B

DESCRIPTION OF CHANGE AND BASIS FOR CHANGE REQUEST

The purposes of 10 CFR 50, Appendix J leak test requirements, as stated in the introduction to the rule, are to assure that (a) leakage through the primary reactor containment and systems and components penetrating primary containment shall not exceed allowable leakage rate values as specified in the Technical Specifications or associated bases and (b) periodic surveillance of reactor containment penetrations and isolation valves is performed so that proper maintenance and repairs are made during the service life of the containment, and systems and components penetrating primary containment. The importance of maintaining containment leakage within regulatory limits is the assurance that radioactive releases resulting from postulated design basis accidents will remain consistent with the accident analyses. This Technical Specifications change request is concerned with part (b) of the Appendix J stated purpose. Part (a) of the stated purpose applies to potential containment structural leakage which is tested in accordance with the guidance for Type A ILRT.

The proposed Technical Specifications change is requested to support the implementation of Option B of 10 CFR 50, Appendix J, for Type B and Type C containment leak testing during VEGP Unit 1 refueling outage 1R6, which is currently scheduled for March 10, through April 19, of 1996. The implementation of Option B for type A, B, and C tests for both units is being incorporated into the Improved Technical Specifications that are scheduled to become effective after refueling outage 1R6.

In accordance with Appendix J, either Option A or Option B may be implemented. However, the proposed Technical specification change is necessary for the adoption of Option B. The proposed change does not modify any plant equipment. It only provides a mechanism within the Technical Specifications for implementing an NRC approved regulation. The proposed change is necessary to prevent violation of the Technical Specifications while adopting the performance-based option of 10 CFR 50, Appendix J during 1R6 prior to the expected effective date of the Improved Technical Specifications..

The purpose of the current footnote which is being deleted, has been fulfilled and the footnote is now void. It has had no meaning since November 1, 1994, and could create confusion and misunderstanding if left in the Technical Specifications. Therefore, the deletion of the footnote is considered administrative in nature.

ENCLOSURE 2

VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS TO ALLOW TYPE B AND C TESTS FOR REFUELING OUTAGE 1R6 TO BE CONDUCTED IN ACCORDANCE WITH 10 CFR APPENDIX J OPTION B

10 CFR 50.92 EVALUATION

Proposed Change

A footnote is added to Technical Specifications Surveillance Requirement 4.6.1.2.d which reads "The type B and C tests scheduled for refueling outage 1R6 will be conducted in accordance with Option B of 10 CFR 50 Appendix J, using the guidance of Regulatory Guide 1.163, rev. 0." In addition, the footnote at the bottom of Page 3/4 6-3 which reads:

"*The Type C test interval for Unit 1 valves HV-1974 (and associated check valve 1-1217-U4-113), HV-1975, HV-1978, and HV-1979 may be extended to prior to entry into Mode 4 following the next scheduled refueling outage (or the next forced outage requiring entry into Mode 5), but no later than November 1, 1994."

is deleted.

Evaluation

The type B and C testing to be conducted at refueling outage 1R6 will be in accordance with 10 CFR 50 Appendix J Option B requirements. The inspections will be conducted in accordance with the guidance provided by the NRC in Regulatory Guide 1.163 revision 0. This document specifies acceptable methods for compliance with Appendix J Option B. The testing program is currently being revised in accordance with this Regulatory Guide and is expected to be implemented at 1R6. Incorporation of the reference to this guide into the Technical Specification assures prior review and approval by the NRC of licensee deviations from its approved methods.

The implementation of this proposed change to the Technical Specifications for refueling outage 1R6 does not apply to the requirements for testing the airlocks or purge supply and exhaust valves with resilient seals. The requirements for testing these items are specified in specifications 4.6.1.2.e and f and will be unchanged by the proposed addition of the footnote to specification 4.6.1.2.d.

Georgia Power Company (GPC) has reviewed the proposed change and determined that it does not involve a significant hazards consideration based on the following:

ENCLOSURE 2 (CONTINUED)

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10 CFR 50.92 EVALUATION

1. The change does not involve a significant increase in probability or consequences of an accident previously evaluated. The proposed change does not involve a change to structures, systems, or components which would affect the probability or consequences of an accident previously evaluated in the Vogtle Electric Generating Plant (VEGP) Final Safety Analyses Report (FSAR). The proposed change only provides a mechanism within the Technical Specifications for implementing a performance-based method of determining the frequency for leak rate testing which has been approved by the NRC via a revision to 10 CFR 50, Appendix J.
2. The proposed change will not create the possibility of a new or different kind of accident from any accident previously analyzed. The amendment will not change the design, configuration, or method of plant operation. It only allows for the implementation of Option B of 10 CFR 50, Appendix J for Unit 1 refueling outage 1R6 without violating the plant Technical Specifications.
3. Operation of VEGP, Unit 1, in accordance with the proposed change will not involve a significant reduction in the margin of safety. The proposed change does not affect a safety limit, an LCO, or the way plant equipment is operated. The NRC is aware that changes similar to this proposed change are required in order to implement Option B of 10 CFR 50, Appendix J. In fact, the staff indicates in Paragraph V. B. of Appendix J that Option B or parts thereof may be adopted by a licensee 30 days after the rule becomes effective by submitting notification of its implementing plan and a request for revision to Technical Specifications. Since the NRC has approved the provision for performance-based testing and must approve this Technical Specifications change before the performance-based Option B can be implemented, the margin of safety will not be significantly reduced.

ENCLOSURE 3

VOGTLE ELECTRIC GENERATING PLANT
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PAGE CHANGE INSTRUCTIONS

The proposed change to the Vogtle Electric Generating Plant Technical Specifications will be incorporated as follows:

<u>Page</u>	<u>Instruction</u>
3/4 6-3	Replace

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS

- b. If any periodic Type A test fails to meet $0.75 L_a$, the test schedule for subsequent Type A tests shall be reviewed and approved by the Commission. If two consecutive Type A tests fail to meet $0.75 L_a$, a Type A test shall be performed at least every 18 months until two consecutive Type A tests meet $0.75 L_a$ at which time the above test schedule may be resumed;
- c. The accuracy of each Type A test shall be verified by a supplemental test which:
 - 1) Confirms the accuracy of the test by verifying that the absolute value of the supplemental test result, L_c , minus the sum of the Type A and the superimposed leak, L_o , is equal to or less than $0.25 L_a$;
 - 2) Has a duration sufficient to establish accurately the change in leakage rate between the Type A test and the supplemental test; and
 - 3) Requires that the rate at which gas is injected into the containment or bled from the containment during the supplemental test is between $0.75 L_a$ and $1.25 L_a$.
- d. Type B and C tests shall be conducted with gas at a pressure not less than P_a , 37 psig, at intervals no greater than 24 months* except for tests involving:
 - 1) Air locks and
 - 2) Purge supply and exhaust isolation valves with resilient material seals.
- e. Air locks shall be tested and demonstrated OPERABLE by the requirements of Specification 4.6.1.3;
- f. Purge supply and exhaust isolation valves with resilient material seals shall be tested and demonstrated OPERABLE by the requirements of Specification 4.6.1.7.2;
- g. The provisions of Specification 4.0.2 are not applicable.

The Type B and C tests scheduled for refueling outage 1AG will be conducted in accordance with Option B of 10 CFR 50, Appendix J, using the guidance of Regulatory Guide 1.163 Rev. 0.

**The Type C test interval for Unit 1 valves HV-1974 (and associated check valve 1-1217-U4-113), HV-1975, HV-1978, and HV-1979 may be extended to prior to entry into Mode 4 following the next scheduled refueling outage (or the next forced outage requiring entry into Mode 5), but no later than November 1, 1994.*