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NED-84-413

August 6, 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 DOCKET 50-366
OPERATING LICENSE NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNIT 2
REQUEST TO CHANGE ISOLATION ACTUATION SETPOINT
IN THE TECHNICAL SPECIFICATIONS FOR SIX VALVES

Gentlemen:

As required by 10 CFR 50.59(c)(1), and in accordance with the provisions of 10 CFR 50.90, Georgia Power Company proposes amendments to the Plant Hatch Unit 2 Technical Specifications (Appendix A to the Operating License). The proposed changes would provide relief for Unit 2, which is in the last stages of preparation for startup following an extended shutdown for refueling and major plant modifications.

On May 4, 1984, plant personnel identified that an apparent discrepancy existed between the installed actuation setpoints for certain RHR system and Core Spray system isolation valves and the inferred actuation setpoint in the Technical Specifications. Each of the ten valves in the attached Table 1 is identified in the Technical Specifications as isolating on a Group 2 signal. The Group 2 isolation signals are either Reactor Vessel Water Level -Low (RPV level 3) or Drywell Pressure -High. However, the original installed plant design calls for valve isolation to occur at Reactor Vessel Water Level -Low Low Low (RPV level 1) instead of RPV level 3.

The architect/engineer was requested to investigate the apparent discrepancy to identify whether a design error existed or whether the Technical Specification valve group identification was incorrect. The A/E conclusion, received by Georgia Power Company on August 2, 1984, is based on a thorough review of pertinent A/E and NSSS vendor design drawings. The drawings indicate that the valves listed in Table 1 should, in fact, isolate at RPV level 1. Electrical elementary drawings indicate that the subject valves should receive a close signal from switch 1 of instruments 2B21-N031 A-D.

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Each instrument has four switches, two of which are labelled "low" and two of which are labelled "high". The instrument data sheet for 2B21-N031 A-D indicates that switches 1 and 2 should be set at a value consistent with RPV level 1 and switches 3 and 4 should be set at a value consistent with RPV level 2. Neither of these level settings is consistent with a Group 2 isolation signal (RPV level 3). We therefore conclude that a change to the Technical Specifications is necessary in order to make that document consistent with the original design drawings.

The following discussion provides a licensing basis to support the proposed changes. All of the valves listed in Table 1 are associated with either the RHR or Core Spray systems. Both of these systems are designed to automatically actuate at RPV level 1. All of the valves in Table 1 are normally closed.

Each of the subject valves receives an actuation signal from ATTS Transmitter Trip Units 2B21-N691 A-D, which replaced switches 2B21-N031 A-D to provide the RPV level 1 ECCS actuation signals. This present configuration is consistent with the original design of the plant.

Valves 2E11-F011 A&B and 2E11-F026 A&B are RHR heat exchanger drains to the Torus and the RCIC system respectively. These valves cannot impact the ability of the RHR system to automatically supply cooling water to the reactor until such time as the system is actuated, which would occur at the RPV level 1 trip point.

Valves 2E11-F016 A&B and 2E11-F028 A&B are Containment Spray Isolation Valves which could be used to spray the drywell or torus in the event of a LOCA. These valves, again, will not impact the ability of the RHR system to automatically supply cooling water to the reactor until such time as the RHR system is actuated, which would occur at the RPV level 1 trip point. In addition, once closed these valves cannot be easily opened until RPV water level has recovered to above 2/3 core height.

Valves 2E21-F015 A&B are the Core Spray system full flow test valves to the Torus. These valves are normally closed, and would be open only during a system test. These valves cannot impact the Core Spray system's ability to automatically provide water to the core until such time as the Core Spray system is actuated. This would occur at the RPV level 1 trip setpoint.

The design actuation point of each of the subject valves is consistent with the design actuation point of its system. The accident analyses, as reported in the FSAR, assumes that the Core Spray and RHR systems would be actuated at a RPV level 1 trip point. Therefore, the actuation of the valves at RPV level 1 is consistent with the original design of the plant as reported in the FSAR.

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The Plant Review Board has reviewed the proposed changes to the Technical Specifications, and has concluded that the proposed changes do not constitute an unreviewed safety question, because 1) The probability of occurrence or the consequences of an accident or malfunction of equipment important to safety is not increased above those evaluated in the FSAR due to this change, because the original accident analysis as presented in the FSAR assumes that valves 2E11-F011 A&B, 2E11-F016 A&B, 2E11-F026 A&B, 2E11-F028 A&B, and 2E21-F015 A&B would receive their actuation signal at the RPV level 1 trip setpoint. 2) The possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR does not result from this change because the design is consistent with the design considered in the original accident analysis. 3) The margin of safety as defined in the basis for the Technical Specifications is not reduced due to this change in that the safety analysis was based on the original design which assumed that the subject valves close at the RPV level 1 trip setpoint.

In the brief period of time since the discrepancy was resolved as incorrect isolation setpoints in the Technical Specifications, we have evaluated the potential scope and expected duration for a plant design change and modification. The difficulty in raising the isolation setpoint for the affected valves from RPV level 1 to RPV level 3 arises from the absence of sufficient ECCS instrument channels at RPV level 3 to provide the necessary number of channels for divisional redundancy of the isolation signal. Two new instrument channels would be required at RPV level 3, complete with level transmitters, trip units, relays, reset switches, tubing, cables, conduit, and wiring. Design engineering and installation are each estimated to require three weeks to complete. In addition, plant procedures would need revision, and functional tests would need to be written and implemented. Of the above listed items, procurement of level transmitters is the limiting factor, with an estimated 20 weeks delivery time. Although most work could be performed prior to receipt of the level transmitters, installation and functional testing of the transmitters would bring the estimated critical path schedule to some 22 weeks.

Due to the relatively short period of time remaining before the planned Unit 2 startup, Georgia Power Company finds it necessary to request expedited NRC review of our proposed changes, and relief from the obligatory 30 day notice period required by 10 CFR 50.92, in order to enable Unit 2 to resume operations on schedule.

Instructions for incorporation of these changes, along with copies of the affected Technical Specification pages are enclosed as Attachment 2.

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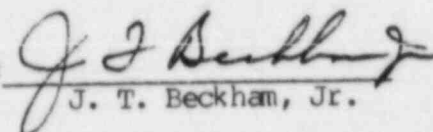
In accordance with the revised fee schedule, a check for \$150.00 is enclosed.

As required by 10 CFR 50.92, an analysis of the proposed changes to the Technical Specifications is enclosed with this submittal.

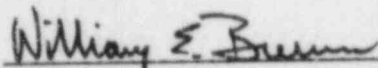
Pursuant to the requirements of 10 CFR 50.92, J. L. Ledbetter of the Georgia Department of Natural Resources will be sent a copy of this letter and all applicable attachments.

J. T. Beckham, Jr. states that he is Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that to the best of his knowledge and belief the facts set forth in this letter are true.

GEORGIA POWER COMPANY

By: 
J. T. Beckham, Jr.

Sworn to and subscribed before me this 6th day of August, 1984.



Notary Public

Notary Public, Georgia, State at Large
My Commission Expires Aug. 26, 1986
RDB/mb

Enclosure

xc: H. C. Nix, Jr.
Senior Resident Inspector
J. P. O'Reilly, (NRC-Region II)
J. L. Ledbetter

TABLE 1

Containment Isolation Valve/Function

2E11-F011 A&B	RHR Heat Exchanger Drain Isolation Valves
2E11-F026 A&B	RHR Heat Exchanger Drain Isolation Valves
2E11-F016 A&B	Containment Spray Isolation Valves
2E11-F028 A&B	Containment Spray Isolation Valves
2E21-F015 A&B	Core Spray Flow Test Line Isolation Valves

ATTACHMENT 2
NRC DOCKET 50-366
OPERATING LICENSE NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNIT 2
PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

The proposed change to Technical Specifications (Appendix A to Operating License NPF-5) would be incorporated as follows:

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