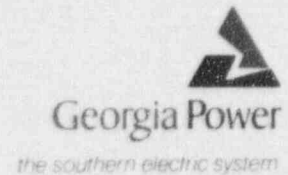


J. T. Beckham, Jr.  
Vice President—Nuclear  
Hatch Project



December 4, 1995

Docket No. 50-321

HL-5065

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

Edwin I. Hatch Nuclear Plant - Unit 1  
Reactor Pressure Vessel Examination - Spring 1996

Gentlemen:

Pursuant to the provisions of 10 CFR 50.55(a)(g)(6)(ii)(A)(3), Georgia Power Company (GPC) has elected to defer the augmented reactor pressure vessel (RPV) examinations for Hatch Unit 1 to the first period of the third inspection interval. The third interval will commence on January 1, 1996. The deferral will allow additional time for resolution of Boiling Water Reactor Vessel Intervals Project (BWRVIP) initiatives regarding RPV examinations. GPC believes that the methodology being proposed by the BWRVIP is justified, and if implemented by an appropriate Code of Federal Regulations rule change, would result in substantial savings for all utilities while maintaining safety margins.

The deferral is allowed by current regulations. 10 CFR 50.55(a)(g)(6)(ii)(A)(3) states that licensees with fewer than 40 months remaining in the inservice inspection interval in effect on September 8, 1992, may elect to defer the augmented RPV examinations as long as certain conditions are met. Unit 1 is currently under the 1980/W81 version of The American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, and began the last 40-month period of the second interval on September 1, 1992, thereby meeting the criteria for deferral of the augmented examinations. GPC will update to the 1989 ASME Section XI for the inspection interval which starts January 1, 1996.

However, deferral of the augmented RPV examinations is contingent upon Nuclear Regulatory Commission (NRC) staff reapproval of a relief request concerning inspection of the RPV shell welds. The NRC staff previously approved GPC's second interval relief request No. 2.1.1 related to less than 100 percent examination of RPV and closure head circumferential, longitudinal, and meridional welds in a safety evaluation report dated September 29, 1986. However, the NRC staff subsequently denied the relief request in a safety evaluation report dated June 22, 1989. As stated in the safety evaluation report, the denial was based on the NRC staff's concern for service induced degradation and the NRC's policy that the industry should develop the means to examine essentially 100 percent of the RPV welds. Since the current regulations allow licensees that defer the

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augmented examinations to retain previously granted relief request related to RPV examinations, it is necessary to request the NRC staff to reapprove GPC's relief request No. 2.1.1 for Hatch Unit 1 only. The conditions set forth in the current regulations are further described and addressed as follows:

1. 10 CFR 50.55(a)(g)(6)(ii)(A)(3)(i) (ISI) states that the deferred augmented examinations may not be used as a substitute for the reactor vessel shell weld examination scheduled for implementation during the inservice inspection interval in effect on September 8, 1992.

GPC will perform second interval ultrasonic outside diameter examinations during the Unit 1 Spring 1996 refueling outage, using the provisions of IWA-2400(c) and IWB-2412(b) of the 1980 Edition/Winter 1981 Addenda of ASME Section XI. GPC will consider these RPV examinations as second interval exams only. The third inspection interval will officially commence on January 1, 1996 as currently scheduled. For consistency, the RPV examinations will be conducted in accordance with third interval Code requirements. The RPV examinations will be reported on the Owners Data Report (NIS-1) as second interval examinations.

2. 10 CFR 50.55(a)(g)(6)(ii)(A)(3)(ii) states that the deferred augmented examinations may be used as a substitute for the RPV examinations normally scheduled for the interval in which the augmented examinations are performed.

GPC considers the deferred augmented examinations as meeting the third interval reactor vessel shell weld examination requirements.

3. 10 CFR 50.55(a)(g)(6)(ii)(A)(3)(iii) states that if the deferred augmented examinations are used as a substitute for the normally scheduled examinations, subsequent examinations must be performed during the first period of successive inspection intervals.

GPC will schedule the Unit 1 RPV shell weld examinations for the first period of successive inspection intervals.

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4. 10 CFR 50.55(a)(g)(6)(ii)(A)(3)(iv) states that licensees that defer the augmented examinations may retain all previously granted reliefs that otherwise would be revoked by 10 CFR 50.55(a)(g)(6)(ii)(A)(1) for the inservice inspection interval in effect on September 8, 1992.

As described previously, GPC does not currently have an approved relief request revoked by this provision. However, GPC believes that reinstatement of a previous relief request is justified as follows:

10 CFR 50.55(a)(g)(1), Inservice Inspection Requirements, requires that a facility whose construction permit was issued prior to January 1, 1971, meet new ISI requirements imposed by 10 CFR 50.55(a)(g)(4) and (5) to the extent practical. Although Unit 1 has a construction permit date of September 30, 1969, it has been GPC's policy to file relief request with the NRC staff. The 1980/W81 version of ASME Section XI requires that one circumferential and one longitudinal weld be examined during the second interval. However, access on Unit 1 was provided to meet the 1971 Edition of ASME Section XI, which required examination of 5 percent of each circumferential weld and 10 percent of each longitudinal weld. As a result of this discrepancy, GPC submitted relief request No. 2.1.1 associated with Code Item No. B1.10 by letter dated June 25, 1985. This relief request stated that Item Nos. B1.11 and B1.12 would be inspected from the outside diameter to the extent necessary to assure that the equivalent length of one circumferential and one longitudinal weld was inspected. The inspections did not specify the extent to which any particular weld would be examined, as welds are to be examined based on accessibility and ALARA considerations. This remains our criteria when selecting actual examination locations.

GPC relief request No. 2.1.1 was previously approved by the NRC in a safety evaluation report dated September 29, 1986, with the provision that "the licensee examine, to the extent practical, (portions of) additional RPV welds, such that the length of total welds examined will equal the length of the individual welds requiring examination." However, by letter dated June 22, 1989, the NRC superseded the original approval and denied the relief request based on the NRC's policy of performing 100 percent examinations.

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GPC requests that relief request No. 2.1.1 be reinstated with regard to Item No. B1.10 for Unit 1. Reinstatement of the subject relief request for Unit 2 is not necessary.

5. 10 CFR 50.55 (a)(g)(ii)(A)(3)(v) states that licensees with fewer than 40 months remaining in the inservice inspection interval in effect on September 8, 1992, may extend that interval in accordance with the provisions of Section XI (1989 Edition) IWA-2430(d) for the purpose of implementing the augmented examination during that interval.

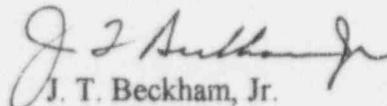
This condition does not apply. The second interval RPV examinations will be conducted during the Spring 1996 Unit 1 outage utilizing relief request 2.1.1. The augmented examinations will then be conducted as third interval examinations during the first period of the third inspection interval.

6. 10 CFR 50.55(a)(g)(6)(ii)(A)(3)(vi) states that the deferred augmented examination shall be performed in accordance with the related procedures specified in the Section XI edition and addenda applicable to the inspection interval in which the augmented examination is performed.

GPC will perform all augmented shell examinations in accordance with this criteria.

GPC is currently completing plans for the 1996 Spring Unit 1 refueling outage and, therefore, request that relief request No. 2.1.1 be reinstated for Unit 1. As always, our staff is available to answer questions or provide additional information as necessary to support the NRC's review.

Sincerely,

  
J. T. Beckham, Jr.

DMC/eb

cc: (See next page.)



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cc: Georgia Power Company

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Mr. K. Jabbour, Licensing Project Manager - Hatch

U. S. Nuclear Regulatory Commission, Region II

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