

I-MOSBA-234

Interoffice Correspondence

DOCKETED Georgia Power
USNRC

'95 OCT 20 P3:28

DATE: September 15, 1989

RE: Addition of Hydrogen Peroxide During 1R1
Log: NOV-00385
Security Code: NC

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

FROM: W. F. Kitchens

TO: G. Bockhold, Jr.

During shutdown for the first refueling outage, hydrogen peroxide was added to the RCS as a cleanup measure to reduce radiation exposure to outage workers. This was a planned activity shown on the schedule, and was performed in MODE 5 during the initial RCS drain down. The chemical was added in amounts of approximately 2.5 gallons four times during October 12, 1988 and October 13, 1988. (Attached is a chronology of operations performed on these dates, as documented in the SS logbook.)

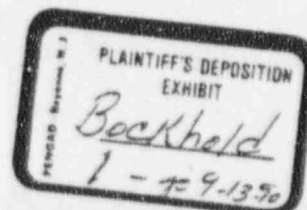
To comply with Tech Spec 3.4.1.4.2, a clearance (#1-88-371) was used to ensure that certain RMWST valves were locked closed per procedure 14228-1. During the hydrogen peroxide additions, three of these valves were momentarily opened under functional test provisions. The action statement was entered each time, and these valves reclosed within four minutes or less, as documented in the SS logbook.

Operations Management was consulted on the appropriateness of entering the ACTION statement of 3.4.1.4.2 to perform chemical addition in MODE 5 with RCS loops not filled. Management provided concurrence, and gave a tech spec interpretation that allowed momentary entry into this ACTION statement. (Based on accepted practice at another nuclear plant, verbal guidance was given that "immediate" action must be taken within five (5) minutes.) After consulting with the NSAC Manager, a Tech Spec change request was initiated to make it clear that these valves could be opened momentarily for addition of chemicals. This change would avoid the need to enter the ACTION statement. The LDCR was initiated, and scheduled for completion prior to the next refueling. Also, an outage critique comment was initiated to track this Tech Spec improvement.

Today, I was informed of a concern by a Technical Support staff member that a "tech spec violation" had occurred when the RMWST valves were opened during 1R1. This staff member was processing the LDCR for the Tech Spec change, and when he discovered we voluntarily entered ACTION statement 3.4.1.4.2, was concerned that we may have violated Tech Specs. This memo is to document the facts, and address this concern.

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PDR

NUCLEAR REGULATORY COMMISSION
Docket No. 50-424/425-OLA-3 EXHIBIT NO. II-234
In the matter of Georgia Power Co. et al., Vogtle Units 1 & 2
☐ Staff ☐ Applicant ☒ Intervenor ☐ Other
☐ Identified ☒ Received ☐ Rejected Reporter SD
Date 9/7/95 Witness George Bockhold



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G. Bockhold, Jr.
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In my opinion, no violation of Tech Specs occurred, because when the LCO was not satisfied, the appropriate ACTION statement was entered and appropriate actions were taken per 3.4.1.4.2. This is a basic Tech Spec compliance issue, and direction for such compliance is given in sections 3.0.1 and 3.0.2. The BASIS for these Tech Specs was not violated. I know of no legal restriction upon voluntary entry into Tech Spec ACTION statement, so long as the action is taken as stated. Since I would prefer to not have to enter ACTION statements to perform routine plant operations, I continue to support the LDCR for a Tech Spec change.

A side issue that was addressed because of our experience during the first refueling was to define "with reactor coolant loops not filled". As part of the review described above, after consultation with Westinghouse, we issued, on 2/22/89, a written Tech Spec interpretation. A verbatim definition would be that loops are not filled when level has been drained below 188'-3" (top of hot leg). I believe that level was above the top of the hot legs when the hydrogen peroxide was added to the RCS on 10/12/88 and 10/13/88. Therefore, an argument could be made that 3.4.1.4.2 was not applicable at that time. Our current Tech Spec interpretation puts this specification into effect upon drain down below 25% pressurizer cold cal level, and is conservative.

Skip Kitchens

WFK/erd

Attachment

xc: J. E. Swartzwelder
R. L. LeGrand
A. G. Rickman
M. B. Lackey
A. L. Mosbaugh
NORMS