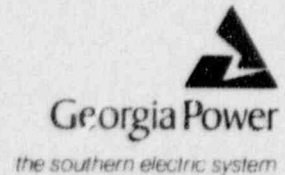


Georgia Power Company  
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C. K. McCoy  
Vice President, Nuclear  
Vogtle Project



February 19, 1996

LCV-0603-F

Docket Nos. 50-424  
50-425

TAC Nos. M92131  
M92132

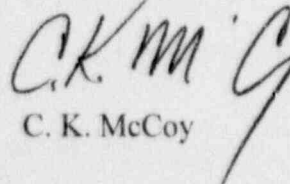
U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT  
PROPOSED CONVERSION OF THE UNIT 1 AND UNIT 2  
TECHNICAL SPECIFICATIONS BASED ON NUREG-1431  
COMMENTS ON DRAFT SAFETY EVALUATION

In response to your letters dated January 17, 1996, and February 1, 1996, Georgia Power Company (GPC) has reviewed the draft safety evaluation of GPC's proposed conversion of the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications as provided to us by the subject letter. Enclosed are marked-up pages with comments reflecting the results of our review.

Sincerely,

  
C. K. McCoy

CKM/NJS

Enclosures

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U. S. Nuclear Regulatory Commission  
LCV-0603-F  
Page 2

xc: 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

## ENCLOSURE 1

### **GPC COMMENTS ON DRAFT SAFETY EVALUATION OF PROPOSED TECHNICAL SPECIFICATIONS - VOGTLE ELECTRIC GENERATING PLANT UNITS 1 AND 2 NRC LETTER DATED JANUARY 17, 1996**

1. This paragraph refers to a letter dated January 19, 1995, making certain commitments regarding relocation of information to the FSAR, TRM, or improved TS Bases. GPC has not submitted such a letter regarding the Vogtle improved TS.
2. The requirements of CTS 3/4.11.2.5 and 3/4.3.3.10 are being replaced with improved TS 5.5.12, "Explosive Gas and Storage Tank Radioactivity Monitoring."
3. The parenthetical phrase "used by the licensee" implies that we do not perform cross calibration of RTDs. This is not the case.
4. The proposed change corrects a typographical error.
5. Our submittal was revised to withdraw this difference from the STS.
6. The proposed change is more precise with respect to neutron detectors and the requirements of the Channel Calibration definition.
7. The proposed change is a more precise statement of the disposition of the CTS requirements.
8. The proposed change is more precise with regard to the adoption of Option B of Appendix J.
9. The proposed change is an editorial comment. Addition of the word "separately" completes the thought of the sentence in question.
10. The proposed change clarifies that GPC would prefer to maintain this commitment via the TRM, and that manual initiation of at least one train maintains the basis of the preceding discussion without implying that all four trains will be capable of manual initiation.
11. GPC will revise the submittal to reference Required Action A.2.2 in the Completion Times for Required Actions A.4, A.5, and A.6.
12. The proposed changes are offered as clarification.
13. In Mode 5 with the loops not filled and Mode 6, the CTS require the subject valves to be closed regardless of the operability of the source range instrumentation. CTS Action 5 applies when the valves are allowed to be open and less than the required source range instrumentation is operable.

## ENCLOSURE 1 (CONTINUED)

14. The PTLR will contain the specific values for these parameters, and the methodology used to calculate these values will be contained in:
  - a. WCAP-14040, Revision 1, "Methodology Used to Develop Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves," and,
  - b. The letter stating NRC approval of WCAP-14040, Revision 1, "Methodology Used to Develop Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves," (TAC M91749), dated October 16, 1995.
15. The proposed changes are offered so that there is no misunderstanding concerning any requirements for prior NRC review and approval of revisions to the PTLR.
16. The cited example is inappropriate for VEGP. Our CTS Bases state that the PORVs are considered operable in either the manual or automatic mode.
17. The proposed change more closely reflects the improved TS language.
18. The proposed change is offered as a clarification. The valve controls may or may not be in proximity with the valve.
19. The 97 percent availability applies to the facility as a whole.
20. Notes 1 and 2 to Condition H do not stipulate that Condition H may be used solely for the manufacturer's recommended 18-month DG preventive maintenance. The Bases state that Condition H may be used for maintenance and design changes.
21. The proposed change is offered as a clarification. The "25 % teardown maintenance" may be required more frequently in the event of adverse indications.
22. The proposed changes are offered to make the writeup for Note 1 to Condition C and Note 2 to Condition H consistent with the improved TS Bases.
23. The proposed change is offered as a more precise statement of the requirement.
24. The proposed change is offered to make the writeup consistent with the improved TS Bases.
25. The proposed change is offered as a clarification. The referenced required actions do not have a 30-day Completion Time.
26. GPC requests that the information be deleted. We deleted this information with our revised submittal.

## ENCLOSURE 1 (CONTINUED)

27. The proposed change is offered to make the writeup consistent with the actual improved TS requirement.
28. GPC offers the following writeup to address the disposition of the indicated CTS requirements:

The licensee has proposed to replace CTS 3/4.3.3.10, "Explosive Gas Monitoring Instrumentation," 3/4.11.1.4, "Liquid Holdup Tanks," 3/4.11.2.5, "Explosive Gas Mixture," and 3/4.11.2.6, "Gas Decay Tanks," with improved TS 5.5.12, "Explosive Gas and Storage Tank Radioactivity Monitoring," which provides controls for potentially explosive gas mixtures contained in the gaseous waste processing system and quantity of radioactivity contained in each gas decay tank and unprotected outdoor liquid storage tanks. This change is less restrictive because the actual limits, actions, and surveillances have been moved to a TS-related administrative controls program outside the TS. However, TS 5.5.12 will require that appropriate limits be maintained. Therefore, this change, which is consistent with the STS, is acceptable.

29. The design modification for the condensate storage tanks is in the process of being rescheduled.
30. Our submittal did not reference a continued requirement for PORV channel calibration with respect to CTS 4.4.4.1.b.