

Georgia Power Company  
333 Piedmont Avenue  
Atlanta, Georgia 30308  
Telephone 404 526-6526

Mailing Address:  
Post Office Box 4545  
Atlanta, Georgia 30302

L. T. Gucwa  
Manager Nuclear Engineering  
and Chief Nuclear Engineer



NED-85-177  
1528N

April 4, 1985

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  
SURFACE EXAMINATION OF FEEDWATER NOZZLES

Gentlemen:

Georgia Power Company (GPC) has scheduled the surface examination of the Plant Hatch Unit 2 feedwater nozzles during the upcoming maintenance/refueling outage pursuant to the requirements of NUREG-0619. Section 4.3.2.3 of the subject NUREG requires that all four feedwater nozzles be examined for those plants having single-sleeve forged-tee spargers. In addition, the NUREG requires that if cracks result in grindouts exceeding the NUREG-specified grindout length and depth, all spargers be removed, nozzles cleaned, and repairs made. Due to concerns regarding these examinations and potential remedial actions, GPC initiated discussions with NRC NRR, MTEB, and Region II personnel. The purpose of this letter is to document the telephone conversations with the aforementioned NRC personnel and their verbal concurrence with GPC's proposal for feedwater nozzle examination.

On March 13, 1985, GPC and Southern Company Services, Inc. (SCSI) personnel contacted the Hatch NRC Licensing Project Manager, Mr. G. Rivenbark, to propose reducing the number of feedwater nozzles from that required by NUREG-0619 to be examined during the 1985 outage at Hatch Unit 2. Several NRC staff personnel from NRC MTEB also participated in the

8504180373 850404  
PDR ADOCK 05000366  
P PDR

A024  
1/0

Director of Nuclear Reactor Regulation  
Attention: Mr. John F. Stolz, Chief  
Operating Reactors Branch No. 4  
April 4, 1985  
Page Two

telephone conversation and included Messrs. W. Hazelton, R. Klecker, and K. Wichman. GPC proposed that just two feedwater nozzles be examined in lieu of all four feedwater nozzles required by the subject NUREG. Justification for reducing the number of feedwater nozzles to be examined included the following:

1. The Hatch Unit 2 sparger configuration (i.e., welded-in spargers) should not allow any by-pass leakage; as a result, cracking is not expected in the feedwater nozzles;
2. The feedwater nozzles on Unit 2 are not clad;
3. The single-sleeve forged-tee spargers provide better access for examination;
4. The surface examination serves only as a confirmatory examination in addition to the ultrasonic examinations conducted every other maintenance/refueling outage pursuant to the inspection requirements of NUREG-0619. The ultrasonic examinations of the feedwater nozzles were last conducted during the 1984 maintenance/refueling outage and yielded acceptable results, although, a fabrication-related indication was observed in the 2N4A nozzle area; and,
5. Discussion with another utility having a similar sparger configuration as Hatch Unit 2 (except that their feedwater nozzles are clad) indicated that they had no relevant surface examination indications after approximately nine years of operation.

When questioned by NRC as to which two nozzles would be examined, GPC indicated that one nozzle from each feedwater loop (i.e., "A" and "B" loops) would be examined. The 2N4A nozzle, located on the "A" loop, was observed to have a fabrication-related indication during the last outage and would be examined. The second nozzle, 2N4D, is located on the "B" loop and is adjacent to the 2N4A nozzle. Should relevant indications be observed in those feedwater nozzles, the remaining feedwater nozzles (i.e., 2N4B and 2N4C) would also be examined. It was further indicated to the NRC personnel that GPC personnel had discussed its examination proposal with an outside consultant considered to be an expert in the area of feedwater nozzle cracking and that the consultant considered GPC's proposal to be a reasonable approach. After caucusing, NRC NRR and MTEB personnel indicated

Director of Nuclear Reactor Regulation  
Attention: Mr. John F. Stolz, Chief  
Operating Reactors Branch No. 4  
April 4, 1985  
Page Three

that GPC's examination proposal was acceptable; however, they also indicated that the proposal should be discussed with NRC Region II personnel and any requirements that the Region had were to be factored into the examinations. Their comments were acknowledged by the GPC personnel.

GPC also expressed concern with the NUREG requirement of having to remove all single-sleeve forged-tee spargers if, during corrective action of removing relevant surface indications by grinding, any grindouts exceed a depth of 0.06-inch by 0.25-inch in length. This would cause extreme hardship for GPC since the spargers at Hatch Unit 2 are of the welded-in type. Mr. Hazelton indicated that this was not the intent of the NUREG for the Hatch Unit 2 sparger configuration and that NRC would work with GPC should relevant indications be observed requiring corrective actions.

Mr. Rivenbark requested that the telephone conversation be documented by letter. A GPC representative acknowledged and indicated that a formal submittal documenting the conversation would be made following discussion of the examination proposal with NRC Region II personnel. Mr. Rivenbark indicated that he would notify Mr. V. Panciera of NRC Region II that GPC would be contacting him to discuss GPC's examination proposal with the appropriate NRC Region II personnel.

GPC personnel contacted Mr. Panciera of NRC Region II on March 14, 1985 to make arrangements for a conference call for discussion of the feedwater nozzle examination proposal with the appropriate NRC Region II personnel. The feedwater nozzle examination proposal was subsequently discussed with Mr. J. Blake of NRC Region II by GPC and SCSI personnel. The presentation to Mr. Blake by GPC personnel was similar in nature to that made to NRC NRR and MTEB personnel during the telephone conversation on March 13, 1985. Mr. Blake indicated that GPC's proposal to reduce the number of feedwater nozzle surface examinations from that required by NUREG-0619 was acceptable to NRC Region II and further indicated that he had discussed the matter with Mr. Hazelton of MTEB. While NRC Region II did not place any conditions on the surface examinations of the two nozzles (i.e., 2N4A and 2N4D) during the 1985 outage, Mr. Blake did indicate that consideration should be given to examining the remaining two nozzles (i.e., 2N4B and 2N4C) the next time the surface examinations are required by the subject NUREG to be performed. It was indicated to Mr. Blake that GPC would document the telephone conversation with him in the letter to NRC NRR and would provide a copy to NRC Region II in accordance with our normal NRC correspondence distribution.

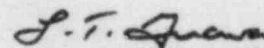


Director of Nuclear Reactor Regulation  
Attention: Mr. John F. Stolz, Chief  
Operating Reactors Branch No. 4  
April 4, 1985  
Page Four

As a result of our conversations with NRC NRR, MTEB, and Region II personnel, it is our understanding that GPC's proposal to examine two feedwater nozzles in lieu of all four required by NUREG-0619 is acceptable and will be pursued accordingly by GPC during the upcoming Hatch Unit 2 outage. Should relevant surface examination indications be observed in either of the 2N4A and 2N4D feedwater nozzles, the remaining nozzles (i.e., 2N4B and 2N4C) will be examined. Further, it is our understanding, based on the conversation with NRR and MTEB personnel, that it is not the intent of NUREG-0619 that the Hatch Unit 2 single-sleeve forged-tee feedwater spargers be removed should grindouts of relevant surface indications exceed a depth of 0.06-inch and length of 0.25-inch as specified in the subject NUREG since the spargers are of the welded-in type. Results of the surface examination of the feedwater nozzles will be reported to NRC Region II pursuant to the requirements of NUREG-0619.

Should NRR, MTEB, or Region II's understanding of the discussions differ from that documented herein, please contact this office at your earliest convenience.

Sincerely yours,



L. T. Gucwa

JAE/mb

xc: J. T. Beckham, Jr.  
H. C. Nix, Jr.  
J. N. Grace (NRC- Region II)  
Senior Resident Inspector