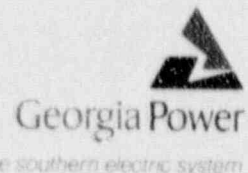


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C. K. McCoy  
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Vogtle Project



May 27, 1992

ELV-03024

Docket Nos. 50-424  
50-425

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT  
PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS  
AS A RESULT OF GENERIC LETTER 87-09

In accordance with the provisions of 10 CFR 50.90, Georgia Power Company (GPC) hereby proposes to amend the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications, Appendix A to Operating Licenses NPF-68 and NPF-81.

Nuclear Regulatory Commission (NRC) Generic Letter 87-09, dated May 4, 1987, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements," provides guidance on acceptable modifications of the Technical Specifications to address three specific problems with sections 3.0 and 4.0 of the specifications. In addition, the generic letter includes improved bases for the unchanged requirements of sections 3.0 and 4.0.

The three problems addressed by the generic letter are as follows:

1. Unnecessary restrictions on mode changes (Specification 3.0.4).
2. Unnecessary shutdowns caused by inadvertent surpassing of surveillance intervals (Specification 4.0.3).
3. Conflicts between Specifications 4.0.3 and 4.0.4 related to mode changes (Specification 4.0.4).

The proposed changes and their bases are described in enclosure 1. An evaluation pursuant to 10 CFR 50.92 showing that the proposed changes do not involve significant hazards considerations is provided as enclosure 2. Instructions for incorporation of the proposed changes into the Technical Specifications and a markup of the affected pages are provided as enclosure 3.

In accordance with 10 CFR 50.91, the designated state official will be sent a copy of this letter and all enclosures.

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Georgia Power Company requests a timely review and concurrence with the technical specifications change and requests NRC's approval by December 31, 1992.

Mr. C. K. McCoy states that he is a 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 and enclosures are true.

GEORGIA POWER COMPANY

By:

C. K. McCoy  
C. K. McCoy

Sworn to and subscribed before me this 26<sup>th</sup> day of May, 1992.

Mary N. Bentley  
Notary Public

CKM/JDK

Enclosures:

1. Basis for Proposed Change
2. 10 CFR 50.92 Evaluation
3. Instructions for Incorporation and Revised Pages

C(w): Georgia Power Company  
Mr. W. B. Shipman  
Mr. M. Sheibani  
NORMS

U. S. Nuclear Regulatory Commission  
Mr. S. D. Ebner, Regional Administrator  
Mr. D. S. Hood, Licensing Project Manager, NRR  
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

State of Georgia  
Mr. J. D. Tanner, Commissioner, Department of Natural Resources

## ENCLOSURE 1

### VOGTLE ELECTRIC GENERATING PLANT PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS IN RESPONSE TO GENERIC LETTER 87-09

#### BASIS FOR PROPOSED CHANGES

##### Proposed Changes

The first proposed change revises Specification 3.0.4 to eliminate unnecessary restrictions on mode changes when conformance to the action requirements establishes an acceptable level of safety for continued operation of the facility for an unlimited period of time. As a consequence of the modification to Specification 3.0.4, individual specifications with action requirements permitting continued operation have been revised to delete or add exceptions to Specification 3.0.4.

The second change revises Specification 4.0.3 to address the case when surveillance intervals are inadvertently exceeded. This proposed revision clarifies the applicability of the action requirements; specifies an acceptable time limit for completing a missed surveillance in certain circumstances; and clarifies when a missed surveillance constitutes a violation of the operability requirements of a limiting condition for operation (LCO).

The third proposed change revises Specification 4.0.4 to allow passage through or to operational modes as required to comply with action requirements.

In addition, the bases for sections 3.0 and 4.0 have been revised to be consistent with the above changes and to provide improved bases for all of the specifications of sections 3.0 and 4.0.

##### Basis

Nuclear Regulatory Commission (NRC) Generic Letter 87-09, dated June 4, 1987, provides guidance for addressing the three specific problems described above that have been encountered with the general requirements or the applicability of LCOs and surveillance requirements in sections 3.0 and 4.0 of the Technical Specifications (TS). The generic letter also provides improved bases for the specifications of sections 3.0 and 4.0. The NRC concluded in the generic letter that these modifications will result in improved TS for all plants.

## ENCLOSURE 2

### VOGTLE ELECTRIC GENERATING PLANT REVISION OF TECHNICAL SPECIFICATIONS AS A RESULT OF GENERIC LETTER 87-09

#### 10 CFR 50.92 EVALUATION

Pursuant to 10 CFR 50.92, GPC has evaluated the proposed amendment and has determined that operation of the facility in accordance with the proposed amendment would not involve significant hazards considerations.

#### Background

On June 4, 1987, the NRC issued Generic Letter 87-09, which provides guidance for addressing three specific problems that have been encountered with the general requirements on the applicability of limiting conditions for operation (LCO) and surveillance requirements in sections 3.0 and 4.0 of the Technical Specifications. The generic letter also provides an update of the bases for the specifications of sections 3.0 and 4.0. The following is a summary of the three problems addressed by the generic letter and by the proposed changes provided in enclosure 3.

The existing Specification 3.0.4 states that entry into an operational mode or other specified condition shall not be made unless the LCO is met without reliance on the provisions of the action requirements. The intent of this statement is to ensure that a higher mode of operation is not entered when equipment is inoperable or when parameters exceed their specified limits. For example, this would preclude a plant startup when actions are being taken to satisfy an LCO, which if not completed within the time limits of the action requirements, would result in a plant shutdown to comply with the action requirements. The existing Specification 3.0.4 also precludes entering a mode or specified condition if an LCO is not met, even if the action requirements would permit continued operation of the facility for an unlimited period of time. A number of individual specifications having action requirements which allow continued operation note that Specification 3.0.4 does not apply. However, these exceptions have not been consistently applied, and their bases are not well documented. This application of exceptions to Specification 3.0.4 impacts the operation of the facility in two ways. First, it delays startup under conditions in which conformance to the action requirements establishes an acceptable level of safety for continued operation of the facility for an unlimited period of time. Second, it delays a return to power operation when the facility is required to be in a lower mode of operation as a consequence of other action requirements. In this case, the LCO must be met without reliance on the action requirements before returning the facility to that operational mode or other specified condition for which continued operation for an unlimited period of time was previously permitted in accordance with the action requirements.

The solution to this problem, as recommended by Generic Letter 87-09, is to revise Specification 3.0.4 to define the conditions under which its requirements apply. The recommended revision to Specification 3.0.4 specifies that entry into an operational mode or specified condition may be made in accordance with

ENCLOSURE 2 (CONTINUED)

REVISION OF TECHNICAL SPECIFICATIONS  
AS A RESULT OF GENERIC LETTER 87-09

10 CFR 50.92 EVALUATION

action requirements when conformance to them permits continued operation of the facility for an unlimited period of time. When an LCO is not met and the associated action requires a shutdown if the LCO cannot be met within a specified time interval, entry into an operational mode or other specified condition is not permitted.

As a result of the recommended modification to Specification 3.0.4, individual specifications with action requirements permitting continued operation no longer need to indicate that Specification 3.0.4 does not apply. Georgia Power Company has reviewed the Technical Specifications to identify those specifications which satisfy the provisions under which mode changes are permitted by the revision to Specification 3.0.4. This proposed amendment includes revisions which delete or add the noted exception to Specification 3.0.4 for these specifications to avoid confusion about the applicability of Specification 3.0.4.

Generic Letter 87-09 includes revising Specification 3.0.4 such that entry into an operational mode is permitted while subject to the provisions of an ACTION statement, provided that the applicable ACTION statement would allow continued operation for an unlimited period of time and would not require a plant shutdown. However, Specification 3.7.1.2 ACTION statement (c) of this submittal currently allows indefinite continued operation with all three auxiliary feedwater pumps inoperable. Although this allowance is understandable for power operation, it is inappropriate to allow startup in this condition. Therefore, Georgia Power Company is proposing the addition of the following sentence to ACTION statement (c) of this specification: "Entry into an OPERATIONAL MODE or other specified condition under the provisions of Specification 3.0.4 shall not be made with three auxiliary feedwater pumps inoperable." This deviation from Generic Letter 87-09 is required in order to meet the intent of the recommended changes.

The second issue addressed by Generic Letter 87-09 concerns Specification 4.0.3 and unnecessary shutdowns caused by inadvertent surpassing of surveillance intervals. The existing Specification 4.0.3 states that the failure to perform a surveillance within the specified time interval shall constitute a failure to meet the operability requirements of the LCO. Therefore, if a surveillance requirement is not met as a result of inadvertent failure to perform the surveillance, the LCO would not be met. Consequently, the action requirements of the LCO must be met as when a surveillance verifies that a system or component is inoperable.

The action requirements of an LCO generally include a specified time interval (i.e., allowable outage time limit) that permits corrective action to be taken to satisfy the LCO. When such a specified time interval is included in the action requirements, the completion of a missed surveillance within this time interval would satisfy Specification 4.0.3. However, some action requirements have allowable outage time limits of only 1 or 2 hours and do not establish a practical time limit for the completion of a missed surveillance requirement.

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REVISION OF TECHNICAL SPECIFICATIONS  
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If surveillances cannot be completed within these time limits, a plant shutdown might be required.

Generic Letter 87-09 concludes that it is overly conservative to assume that systems or components are inoperable simply because a surveillance requirement has not been performed. The letter also takes the position that the vast majority of surveillances demonstrate that systems or components in fact are operable. Georgia Power Company concurs with both of these statements. Therefore, this amendment proposes to revise Specification 4.0.3 as recommended by Generic Letter 87-09.

The proposed revision to Specification 4.0.3 and associated bases clarifies when a missed surveillance constitutes a violation of the operability requirements of an LCO. The proposed change also clarifies the applicability of the action requirements and the time during which the limits apply. In those cases where the allowable outage time limits of the action requirements are less than 24 hours, the action requirements may be delayed for up to 24 hours to permit the completion of a missed surveillance. This part of the revision to Specification 4.0.3 simply involves the adoption of the wording suggested in the generic letter. The statement that exceptions to Specification 4.0.3 are noted in individual specifications is deleted in some cases because the implied exceptions for these specifications no longer exist as a result of this revision.

The third issue involves conflicts between Specifications 4.0.3 and 4.0.4 relating to mode changes. Currently, Specification 4.0.4 prohibits entry into an operational mode or other specified condition when surveillance requirements associated with the LCOs that are applicable in that mode or specified condition have not been performed within the specified surveillance interval. However, in the event that a shutdown is required by an LCO and the plant is forced to pass through or enter a mode or specified condition where surveillance requirements that have not been met become applicable, the action requirements of the LCO associated with these surveillance requirements apply and the unit may have to be placed in a lower mode of operation than that required by the original shutdown action requirements. According to Generic Letter 87-09, it is not the intent of Specification 4.0.4 to prevent passage through or to operational modes to comply with action requirements, and it should not apply when mode changes are imposed by action requirements. Accordingly, Georgia Power Company proposes to revise Specification 4.0.4 as recommended by Generic Letter 87-09.

Generic Letter 87-09 also states that "allowance of an exception to Specification 4.0.4 can create a conflict with Specification 4.0.3" and that an "exception to Specification 4.0.4 is allowed when Surveillance Requirements can be completed only after entry into a mode or specified condition for which they apply... However, upon entry into this mode or condition, the requirements of Specification 4.0.3 may not be met because the Surveillance Requirements may not have been performed within the allowed surveillance interval." Georgia Power Company's interpretation of the Technical Specifications is that unless an

ENCLOSURE 2 (CONTINUED)

REVISION OF TECHNICAL SPECIFICATIONS  
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exception is granted to Specification 4.0.4 for an individual surveillance requirement, the normal surveillance is required to be performed. Taking exception to Specification 4.0.4 in a surveillance requirement explicitly permits entry into an operational mode when the applicable surveillances have not been performed within the required surveillance interval. If this is explicitly allowed, we do not see how this can be interpreted as a violation of the Specification 4.0.3 requirement that surveillances be performed within the allowed surveillance interval. If entry into a mode with the surveillance interval exceeded is acceptable, then that same situation should not be a violation of a specification that is applicable only when the mode is entered. An exception to one specification should not automatically be a violation of a different specification.

For example, surveillance requirement 4.7.1.2.1 associated with the steam turbine-driven pump of the auxiliary feedwater system contains an exemption to 4.0.4. This surveillance is required to be performed at least once per 31 days on a staggered test basis. Time spent in lower modes of operation where the specification does not apply is not part of the required surveillance interval. Using the Staff's interpretation, only the 24-hour "grace" period allowed by the revised 4.0.3 would be available to complete the surveillance before determining that the LCO has not been met and applying the action requirements. Depending on plant conditions during startup and rate of ascension, etc., 24 hours may not be adequate to perform this surveillance or to perform reliable surveillances on parameters such as power distribution limits. Since we currently do not see any conflict between 4.0.3 and 4.0.4 due to the exceptions granted to 4.0.4, it is requested that these exceptions be retained so that the 24-hour "grace" period of Specification 4.0.3 is not limiting with respect to those surveillances which are exempted from the requirements of Specification 4.0.4.

In addition, this proposed amendment includes revised bases for sections 3.0 and 4.0 of the Technical Specifications. The revised bases reflect the revisions to Specifications 3.0.4, 4.0.3 and 4.0.4, as well as improved bases for the unchanged requirements of sections 3.0 and 4.0. The revisions to the bases are as recommended by Generic Letter 87-09 with one exception. Georgia Power Company proposes to retain the example in the bases for Specification 3.0.3 to illustrate the manner in which allowable outage time limits should be administered. The proposed example is as follows:

"For example, if the Containment Spray System was discovered to be inoperable while in START-UP, the ACTION Statement would allow up to 156 hours to achieve COLD SHUTDOWN. If HOT STANDBY is attained in 16 hours rather than the allowed 78 hours, 140 hours would still be available before the plant would be required to be in COLD SHUTDOWN. However, if this system was discovered to be inoperable while in HOT STANDBY, the 6 hours provided to achieve HOT STANDBY would not be additive to the time

ENCLOSURE 2 (CONTINUED)

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available to achieve COLD SHUTDOWN so that the total allowable time is reduced from 156 hours to 150 hours."

The above example was taken from the current version of the Technical Specifications. Georgia Power Company believes that this example provides desirable clarification and is consistent with the intent of Specification 3.0.3.

Analysis

Georgia Power Company has reviewed the requirements of 10 CFR 50.92 as they relate to the proposed changes to sections 3.0 and 4.0 of the Technical Specifications and has determined that these changes do not involve a significant hazards consideration. In support of this conclusion, the following analyses are provided.

1. Revision to Specification 3.0.4 and associated bases

- a. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated because the change simply recognizes those cases where conformance to the action requirements associated with an LCO establishes an acceptable level of safety for continued operation of the facility for an unlimited period of time. Generally, individual specifications that have action requirements which allow continued operation note that Specification 3.0.4 does not apply. However, exceptions to Specification 3.0.4 have not been consistently applied. Rather than applying individual exceptions to Specification 3.0.4 (except in those cases where an exception to Specification 3.0.4 exists and the specification does not satisfy the provisions under which mode changes are permitted by the revision to Specification 3.0.4) the revision to Specification 3.0.4 defines the conditions under which the requirements do apply. Furthermore, Georgia Power Company concurs with the NRC staff position that good practice dictates that plant startup should normally be initiated only when all required equipment is operable, and that startup with inoperable equipment must be the exception rather than the rule. Therefore, since the proposed change will ensure consistent application of Specification 3.0.4 while continuing to ensure an acceptable level of safety for continued operation of the facility, the probability or consequences of an accident previously evaluated will not be significantly increased.
- b. This change does not create the possibility of a new or different kind of accident from any accident previously evaluated. If an LCO has action requirements that permit continued operation for an unlimited period of time, it follows that an acceptable level of safety is provided by

ENCLOSURE 2 (CONTINUED)

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conformance to those action requirements. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- c. The proposed change will not involve a significant reduction in a margin of safety. As previously stated, the proposed revision to Specification 3.0.4 defines the conditions under which Specification 3.0.4 applies. The fact that the action requirements allow for continued operation of the facility for an unlimited period of time implies that an acceptable level of safety is provided for and maintained by conformance to the action requirements. Therefore, it follows that the proposed change does not involve a significant reduction in a margin of safety.
2. Deletion/addition of individual exceptions to Specification 3.0.4  
Where individual specifications satisfy the provisions of revised Specification 3.0.4 under which mode changes would be allowed, the individual exemption statements have been deleted or added, as necessary. The following specifications and tables are affected by this change:

<u>Specification</u>				<u>Table</u>
3.1.3.2	3.4.10	3.9.11	3.11.2.4	3.3-1
3.2.4	3.6.3	3.9.12	3.11.2.5	3.3-2
3.3.3.1	3.7.1.2	3.11.1.1	3.11.2.6	3.3-8
3.3.3.2	3.7.1.5	3.11.1.2	3.11.3	
3.3.3.3	3.7.9	3.11.1.3	3.11.4	
3.3.3.4	3.7.10	3.11.1.4	3.12.1	
3.3.3.9	3.8.4.1	3.11.2.1	3.12.2	
3.3.3.10	3.9.7	3.11.2.2	3.12.3	
3.3.3.11	3.9.9	3.11.2.3		

- a. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated. Each specification listed above, except for specification 3.7.1.2, presently contains an exception to the provisions of Specification 3.0.4. Georgia Power Company has determined that all (with the exception of specification 3.7.1.2) or part of these specifications listed above satisfy the provisions of revised Specification 3.0.4 under which mode changes would be allowed. In other words, each specification has action requirements which provide an acceptable level of safety for continued operation of the facility for an unlimited period of time. Therefore, in accordance with Generic Letter 87-09 the individual exceptions to Specifications 3.0.4 are no longer required and should be deleted in order to avoid confusion about the applicability of Specification 3.0.4. The net effect is that there is no change in the requirements. The individual

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exceptions to Specification 3.0.4 will be replaced by revised Specification 3.0.4. The exception to 3.0.4 is being added to Specification 3.7.1.2 to clarify that mode changes are not allowed with three auxiliary feedwater pumps inoperable. Since there is no net change in the requirements, it follows that the proposed change will not significantly increase the probability or consequences of an accident previously evaluated.

- b. This change does not create the possibility of a new or different kind of accident from any accident previously evaluated. Since there is no net change in the requirements, it follows that there is no possibility of a new or different kind of accident as a result of this change.
- c. The proposed change will not involve a significant reduction in the margin of safety because there is no net change in the requirements.

3. Revision to Specification 4.0.3 and associated bases

- a. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated. The existing Unit 1 Technical Specifications state that the allowable outage time limits apply upon discovery that a required surveillance has been inadvertently omitted. Therefore, the only change in requirements associated with adopting the wording of Generic Letter 87-09 for Specification 4.0.3 and its associated bases involves the addition of a 24-hour interval for performing a missed surveillance if the allowable outage time is less than 24 hours.

Generic Letter 87-09 states that it is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed. The letter further states that the majority of surveillances demonstrate that systems or components in fact are operable, and when a surveillance is missed it is primarily a question of verification of operability by the performance of the required surveillance. In some cases, the condition of a missed surveillance could force a plant shutdown which would be unnecessary if in fact the system or component in question was operable. If a plant shutdown is required before a missed surveillance is completed, it is likely that it would be conducted while the plant is being shut down because completion of a missed surveillance could terminate the shutdown requirement. This is undesirable since it increases the risks to the plant and public safety for two reasons. First, the plant would be in a transient state involving changing plant conditions that offer the potential for an upset that could lead to a demand for the system or component being tested. Secondly, a shutdown would increase the pressure on the plant staff to expeditiously complete the required surveillance so that the plant could be returned to power operation. This would further increase the potential for a plant upset when both the shutdown and surveillance activities place a demand on the plant operations. The NRC staff has

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concluded that, based on consideration of plant conditions, adequate planning, availability of personnel, time required to perform the missed surveillance, and the safety significance of the delay in completion of the surveillance, 24 hours would be an acceptable time limit for completing a missed surveillance when the allowable outage time limit is less than 24 hours or when shutdown action requirements apply. Furthermore, the NRC staff concludes that the 24-hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with action requirements before the surveillance can be completed. Finally, the deletion of the statement that exceptions to Specification 4.0.3 are noted in individual specifications is an administrative change since the implied exceptions do not exist. Specification 4.0.3 always applies.

Georgia Power Company agrees with the evaluation of the NRC staff as presented in Generic Letter 87-09 and therefore concludes that this aspect of the revision to Specification 4.0.3 will not involve a significant increase in the probability or consequences of an accident previously evaluated.

- b. This change does not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated in item 3a above, the proposed revision should minimize the potential for a plant upset due to efforts to comply with an LCO in the event of a missed surveillance. The deletion of the statement regarding noted exceptions to Specification 4.0.3 is an administrative change since the noted exceptions do not exist. Therefore, this change does not create the possibility of a new or different kind of accident.
  - c. The proposed change does not involve a significant reduction in the margin of safety. Equipment operability will continue to be verified as required by the Technical Specifications. The proposed revision should minimize the potential for plant upset due to efforts to meet an LCO in the event of a missed surveillance. The deletion of the statement regarding noted exceptions to Specification 4.0.3 is administrative since the noted exceptions do not exist. Therefore, this change does not involve a significant reduction in the margin of safety.
4. Revision to Specification 4.0.4 and associated bases
- a. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated. As discussed in item 3a, the potential for a plant upset and challenge to safety systems is

ENCLOSURE 2 (CONTINUED)

REVISION OF TECHNICAL SPECIFICATIONS  
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heightened if surveillances are performed during the transition to shutdown to comply with action requirements. Generic Letter 87-09 states that it is not the intent of Specification 4.0.4 to prevent passage through or to operational modes to comply with action requirements, and it should not apply when mode changes are imposed by action requirements. Since the proposed change should reduce the potential for plant upset and challenge to safety systems, there is no significant increase in the probability or consequences of an accident previously evaluated.

- b. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated in item 4a, this change should reduce the potential for plant upset and challenge to safety systems. This change is a clarification which will facilitate conformance to action requirements when mode changes are required. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.
  - c. The proposed change does not involve a significant reduction in the margin of safety. The proposed change is a clarification which will facilitate compliance with action requirements when mode changes are required. The result should be an enhancement to plant safety in the event that inoperable equipment or an out of limit condition requires a plant shutdown. Therefore, there is no significant reduction in the margin of safety.
5. Revision of the bases for Specifications 3.0.1, 3.0.2, 3.0.3, 3.0.4, 4.0.1, 4.0.2, 4.0.3, 4.0.4, and 4.0.5
- a. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated because the Technical Specification requirements have not changed (i.e., Specifications 3.0.1, 3.0.2, 3.0.3, 3.0.4, 4.0.1, 4.0.2, 4.0.3, 4.0.4, and 4.0.5). The bases associated with these requirements have simply been rewritten for clarity. Therefore, there will be no significant increase in the probability or consequences of an accident previously evaluated.
  - b. The proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated in item 5a, there are no changes to the requirements proposed. The proposed change will result in improved bases for the subject specifications. Therefore, there is no possibility of a new or different kind of accident from any previously evaluated.
  - c. The proposed change will not involve a significant reduction in the margin of safety because the requirements have not changed.

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Conclusion

Based upon the analysis provided herein, Georgia Power Company has determined that the proposed changes to the Technical Specifications will not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. Therefore, the proposed changes do not involve a significant hazards consideration as defined by 10 CFR 50.92 (c).