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Vice President—Nuclear
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The Southern Electric System

HL-2280
003624

July 2, 1992

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

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
RESPONSE TO INSPECTION REPORT 92-04

Gentlemen:

By letter dated April 24, 1992, Georgia Power Company (GPC) was requested to clarify our commitments to Generic Letter (GL) 89-10, "Safety-Related Motor Operated Valve Testing and Surveillance". GPC's response to GL 89-10, dated December 28, 1989, stated GPC intended to complete the design basis review and the in situ static pressure testing, in addition to some in situ differential pressure testing, within five years or three refueling outages from the date of the GL. However, during the recent inspection, the inspectors reviewed the Hatch GL 89-10 Program Description which stated that GPC would perform all practicable in-situ differential pressure testing. Consequently, GPC was requested to clarify the schedule exceptions and testing exceptions taken in the original response to the GL. Accordingly, GPC provides the following clarification.

GPC has not taken an exception to the recommended schedule at this time for the areas questioned above. GPC will perform design basis reviews for all safety related motor operated valves (MOV's), and will perform in situ static pressure tests and dynamic pressure tests, where practicable, on safety-related MOV's determined to have an active safety function. These actions are expected to be completed by June 28, 1994.

The exceptions relative to the scope for in situ dynamic testing is clarified as follows. A dynamic differential pressure test is considered to be practicable if the test does not: 1) require a modification to the plant, 2) place the plant in a potentially unanalyzed condition, 3) cause a component or system to be subjected to conditions outside its design basis, 4) have the potential to result in damage to the MOV or other components,

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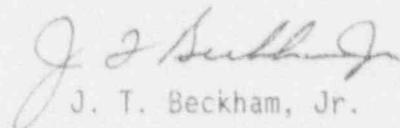
or 5) require temporary pumps, valves, or piping to perform the test. Furthermore, MOVs will not be dynamically tested if an acceptable margin exists between the minimum required thrust to actuate the valve and the maximum thrust available. Appropriate documentation will be developed and maintained in plant records for cases where dynamic testing cannot practicably be performed.

As stated in GPC's original response to GL 89-10, dynamic differential pressure testing, in many cases, will be less than the maximum differential pressure determined from the design basis reviews. When dynamic testing is performed at a pressure less than the design basis differential pressure, the two stage approach as described in GL 89-10 and Supplement 1 to the GL will be used. Appropriate documentation will be developed as necessary and maintained in plant records to justify this approach. With the two-stage approach, GPC will evaluate the capability of the MOV using the best data available at that time and will attempt to obtain other applicable test data by June 28, 1994. The availability of site specific or industry test data suitable for evaluation, or improved evaluation methods such as the Electric Power Research Institute (EPRI) MOV performance prediction program, is expected to be limited prior to June 28, 1994. Consequently, schedule changes may be necessary in the future depending on the availability of industry data suitable for evaluation.

The Generic Letter 89-10 MOV program description will be revised to ensure that GPC's schedule commitments and testing exceptions are clearly stated.

Should you have any questions in this regard, please call this office.

Sincerely,


J. T. Beckham, Jr.

JKB/cr

cc: (See next page.)

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cc: Georgia Power Company

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NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.

Mr. K. Jabbour, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II

Mr. S. D. Ebner, Regional Administrator

Mr. L. D. Wert, Senior Resident Inspector - Hatch