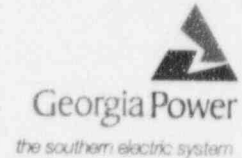


Georgia Power Company
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 877-7279

J. T. Beckham, Jr.
Vice President - Nuclear
Hatch Project



April 5, 1996

Docket Nos. 50-321
50-366

HL-5118

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

Edwin I. Hatch Nuclear Plant
Third 10-Year Interval Inservice Inspection Program
Response to Request for Additional Information

Gentlemen:

By letter dated January 26, 1996, Georgia Power Company (GPC) submitted to the NRC a response to a request for additional information concerning the Third 10-Year Interval Inservice Inspection (ISI) Program for the Edwin I. Hatch Nuclear Plant. In response to the GPC submittal, the NRC requested further information and/or clarification relative to the exemption of certain components which were previously excluded from the Program based on the guidance of Regulatory Guide 1.26. However, based upon the NRC's request, GPC agrees to include the ASME Code Section III, Class 2 penetrations in the Plant Hatch ASME Code Section XI ISI Program. Based on enclosed ASME Code Case N-522, "Pressure Testing of Containment Penetration Piping," GPC requests the NRC grant the enclosed Request for Relief No. RR-13, per the requirements of 10 CFR 50.55a(g)(6)(i).

Additionally, ASME Code Case N-532, "Alternate Requirements to Repair and Replacement Documentation Requirements and Inservice Inspection Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000," provides an alternative to the 1989 Edition of Section XI required NIS-1 and NIS-2 reports. GPC reviewed Code Case N-532 and determined its application would be beneficial to Plant Hatch. Therefore, pursuant to the requirements of 10 CFR 50.55a(a)(3), GPC requests the NRC grant the enclosed Request for Relief No. RR-14.

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

Sincerely,

110024

J. T. Beckham, Jr.

IFL/sp

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U.S. Nuclear Regulatory Commission
April 5, 1996

Page 2

Enclosures: 1. Requests for Relief RR-13 and RR-14
2. ASME Code Cases N-522 and N-532

cc: Georgia Power Company
Mr. H. L. Sumner, Nuclear Plant General Manager
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. K. Jabbour, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. S. D. Ebnetter, Regional Administrator
Mr. B. L. Holbrook, Senior Resident Inspector - Hatch

Enclosure 1

Request for Relief No. RR-13
and
Request for Relief No. RR-14

Edwin I. Hatch Nuclear Plant
Third 10-Year Interval Inservice Inspection Program
Request for Relief No. RR-13

- I. System/Component(s) for Which Relief is Requested: Piping, components, and isolation valves are part of the containment system and, therefore, are designated as Class 2. However, the balance of the piping system containing piping, components, and isolation valves is outside the scope of Section XI. Table 1 and Table 2 provide the affected penetrations for Unit 1 and Unit 2, respectively.
- II. Code Requirement: Table IWC-2500-1, Examination Category C-H, requires pressure testing of all Class 2 components per IWC-5221 and IWC-5222.
- III. Code Requirement for Which Relief Is Requested: Relief from performing the required pressure tests for each of the penetrations listed in Table 1 and Table 2 is requested.
- IV. Basis for Relief: ASME Code Section XI, Code Case N-522, allows Appendix J testing of the subject penetrations as an alternative to the Code-required Category C-H pressure tests. Since Code Case N-522 will not be included in Revision 12 to Regulatory Guide 1.147, relief from performing the Category C-H pressure tests is necessary.
- V. Alternate Examinations: Georgia Power Company (GPC) will comply with the Appendix J testing requirements established for Plant Hatch Unit 1 and Unit 2.
- VI. Justification for the Granting of Relief: The ASME Code Committee evaluated the proposed alternative testing requirements and determined the requirements are acceptable for ensuring the required integrity of the subject Class 2 penetrations. Pursuant to the requirements of 10 CFR 50.55a(a)(3)(i), the implementation of Appendix J requirements ensures an acceptable level of quality and safety and does not decrease the margin of public health and safety. Implementation of the alternative examinations at Plant Hatch will reduce costs, personnel radiation dose, and outage time.
- VII. Implementation Schedule: Pressure testing per the provisions of ASME Code Case N-522 will be conducted in accordance with the test schedule provided in the Plant Hatch Third 10-Year Interval Inservice Inspection Program transmitted to the NRC by letter dated October 17, 1995.

Table 1 (Sheet 1 of 2)
Containment Penetrations Pressure Tested per ASME Code Case N-522

Plant Hatch Unit 1

<u>Penetration</u>	<u>Function</u>	<u>Boundary Diagram</u>
X-18	Radwaste	HB-16176
X-19	Radwaste	HB-16176
X-21	Service Air	HB-16013
X-22	Drywell Pneumatic	HB-16286, HB-16299
X-23	RBCCW	HB-16009
X-24	RBCCW	HB-16009
X-25	Purge & Inerting	HB-16004
X-26	H ₂ O ₂ Sample	HB-16024, HB-16153
X-27A	Fission Product Monitoring	HB-16173
X-27C	Reactor Protection	HB-16330
X-27D	Reactor Protection	HB-16330
X-27E	Purge & Inerting	HB-16024
X-27F	Drywell Pneumatic	HB-16299
X-28	Recirculation Sample	HB-16066
X-28F	H ₂ O ₂ Sample	HB-16276
X-31	H ₂ O ₂ Sample	HB-16276
X-31F	Pump Seal Purge	HB-16066
X-33C	Fission Product Monitoring	HB-16173
X-34E	H ₂ O ₂ Sample	HB-16276
X-44	Service Water	HB-16011

Table 1 (Sheet 2 of 2)
Containment Penetrations Pressure Tested per ASME Code Case N-522

Plant Hatch Unit 1

<u>Penetration</u>	<u>Function</u>	<u>Boundary Diagram</u>
X-45C	Drywell Pressure	HB-16329
X-45D	Drywell Pressure	HB-16329
X-35A-D	TIP Drive	HB-16561
X-35E	TIP N ₂ Purge	HB-16561
X-40C-F	Drywell Pneumatic	HB-16286
X-45E	Purge & Inerting	HB-16024
X-45F	ILRT	HB-16060
X-46	Demineralized Water	HB-16015
X-59A	Pump Seal Purge	HB-16066
X-205	Purge & Inerting	HB-16024
X-206A,B	Purge & Inerting	HB-16024, HB-16332
X-206C,D	Purge & Inerting	HB-16024, HB-16332
X-209A,B,C,D	Purge & Inerting	HB-16024
X-216A,B,C,D	Purge & Inerting	HB-16024
X-217	H ₂ O ₂ Sample	HB-16276
X-218A	Torus Drainage & Purification	HB-16135
X-220	H ₂ O ₂ Sample	HB-16153, HB-16276
X-223A(A-F)	Vacuum Breakers	HB-16024
X-223B(A-F)	Vacuum Breakers	HB-16024

Table 2 (Sheet 1 of 2)
Containment Penetrations Pressure Tested per ASME Code Case N-522

Plant Hatch Unit 2

<u>Penetration</u>	<u>Function</u>	<u>Boundary Diagram</u>
X-3	H ₂ O ₂ Sample	HB-26048
X-18	Radwaste	HB-26026
X-19	Radwaste	HB-26026
X-21	Service Air	HB-26058
X-22	Drywell Pneumatic	HB-26023
X-23	RBCCW	HB-26055
X-24	RBCCW	HB-26055
X-25	Purge & Inerting	HB-26084
X-26	Purge & Inerting	HB-26084
X-28	H ₂ O ₂ Sample	HB-26048
X-32A,C	Drywell Pressure	HB-26014
X-34C	ILRT	HB-26057
X-34D	ILRT	HB-26084
X-35A-E	Neutron Monitoring	HB-26933
X-44	Nitrogen Inerting	HB-26083
X-46	Demineralized Water	HB-26047
X-47	Chilled Water	HB-26081
X-48	Chilled Water	HB-26081
X-51C	Drywell Pneumatic	HB-26066
X-51D	Drywell Pressure	HB-26084
X-54A,C	Drywell Pressure	HB-26015
X-55	Radwaste	HB-26026
X-60A	H ₂ O ₂ Sample	HB-26048
X-60B	Fission Product Monitoring	HB-26016

Table 2 (Sheet 2 of 2)
Containment Penetrations Pressure Tested per ASME Code Case N-522

Plant Hatch Unit 2

<u>Penetration</u>	<u>Function</u>	<u>Boundary Diagram</u>
X-62	Fission Product Monitoring	HB-26016
X-63	Drywell Pneumatic	HB-26066
X-64	H ₂ O ₂ Sample	HB-26048
X-67	Purge & Inerting	HB-26084
X-69	Drywell to Torus ΔP	HB-26079
X-80	Purge & Inerting	HB-26084
X-81	Nitrogen Inerting	HB-26083
X-205	Purge & Inerting	HB-26079
X-206A	Torus Water Level	HB-26084
X-206C	Torus Water Level	HB-26084
X-206H,F	Instrument Lines	HB-26084
X-209A-D	Instrument Lines	HB-26084
X-217A,B	H ₂ O ₂ Sample	HB-26048
X-217C	Fission Product Monitoring	HB-26016
X-218A	Torus Drainage	HB-26042
X-220	Purge & Inerting	HB-26084
X-225A-H,J-M	Purge & Inerting	HB-26084
X-230	Nitrogen Inerting	HB-26083
X-231	Purge & Inerting	HB-26084
X-233	Torus to Drywell ΔP	HB-26079
X-234A	Torus Drainage	HB-26042
X-235A	Purge & Inerting	HB-26084
X-235B	Purge & Inerting	HB-26083

Edwin I. Hatch Nuclear Plant
Third 10-Year Interval Inservice Inspection Program
Request for Relief No. RR-14

- I. Subject for Which Relief is Requested: Administrative change to the documentation and reporting requirements of IWA-6000 for Class 1, 2, and 3 pressure-retaining components and their supports.
- II. Code Requirement: IWA-6000 requires the preparation and submittal of inservice inspection summary reports within 90 days of the completion of the inservice inspection conducted during each refueling outage. Form NIS-1, "Owner's Report for Inservice Inspection," and Form NIS-2, "Owner's Report for Repairs or Replacements," are integral portions of the summary reports.
- III. Code Requirement for Which Relief Is Requested: Relief from preparing the NIS-1 and NIS-2 forms and submitting the inservice inspection summary report within the 90-day time limit is requested.
- IV. Basis for Relief: ASME Code Case N-532, "Alternate Requirements to Repair and Replacement Documentation Requirements and Inservice Inspection Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000," provides an alternative to the 1989 ASME Code Section XI repair and replacement documentation and regulatory reporting requirements. Georgia Power Company (GPC) reviewed Code Case N-532 and determined its implementation will substantially reduce the administrative burden required by IWA-6000. Since Code Case N-532 will not be included in Revision 12 of Regulatory Guide 1.147, relief from the requirements of IWA-6000 is necessary.
- V. Alternate to the Code Requirements: GPC will comply with the requirements of Code Case N-532, with the following clarification regarding reporting of corrective measures. Code Case N-532, paragraph 2.0(c), requires an abstract for repairs, replacements, and corrective measures required due to an item containing a flaw or relevant condition exceeding the acceptance criteria of ASME Code Section XI. According to Section XI, the term "corrective measures" has two applications. One application involves repair and replacement activities on pressure-retaining components (e.g., metal removal and welding). The other application involves maintenance-type activities, such as tightening of bolting, replacing gaskets/packing, cleaning surface corrosion products, and adjusting component supports. For Code Case N-532 reporting, GPC considers "corrective measures" to involve only repair and replacement activities.
- VI. Justification for the Granting of Relief: Previously, GPC submitted voluminous NIS-1 Owner's Data Reports for Inservice Inspections. The process of preparing, reviewing, and submitting the reports within the 90-day time requirement often resulted in difficulties for the GPC staff. With the update to the 1989 Edition to the Code, the NIS-2 Owner's

Reports for Repairs and Replacements are required for the third 10-year interval inspection, thereby, significantly increasing the administrative burden. Implementation of the Code Case N-532 allows the submittal of abstracts versus the reports required by the ASME Code Section XI. Additionally, the implementation of the Code Case is consistent with the NRC's philosophy found in SECY-94-093, dated May 10, 1995. Per SECY-94-093, the NRC is to take a proactive role through its representatives in the ASME Code to modify reporting requirements and to eliminate the need to submit inservice inspection reports following each refueling outage.

The ASME Code Committee evaluated the proposed alternative reporting requirements and determined the requirements are acceptable for replacing the existing documentation and reporting requirements. Since Code Case N-532 only affects documentation and reporting requirements, its implementation will not affect the level of quality and safety, or decrease the margin of public health and safety. While the cost savings associated with Code Case N-532 have not been quantified as a Cost Benefit Licensing Action item, its implementation is consistent with the intent to eliminate nonbeneficial work activities and their associated costs.

- VII. Implementation Schedule: The third 10-year interval for Plant Hatch began January 1, 1996, and the Spring Unit 1 refueling outage commenced on March 23, 1996. Therefore, to provide continuity and consistency, GPC requests to implement Code Case N-532 for the entire interval, including the ongoing Unit 1 outage.

Enclosure 2

ASME Code Case N-522
and
ASME Code Case N-532

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

Approval Date: December 9, 1993

*See Numerical Index for expiration
and any reaffirmation dates.*

Case N-522
Pressure Testing of Containment Penetration
Piping
Section XI, Division 1

Inquiry: What alternative to the rules of Table IWC-2500-1, Category C-H may be used for pressure testing piping that penetrates a containment vessel, when the piping and isolation valves that are part of the containment system are Class 2 but the balance of the piping system is outside the scope of Section XI?

Reply: It is the opinion of the Committee that 10 CFR 50, Appendix J, may be used as an alternative to the rules in Table IWC-2500-1, Category C-H, for pressure testing piping that penetrates a containment vessel, when the piping and isolation valves that are part of the containment system are Class 2 but the balance of the piping system is outside the scope of Section XI?

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

Approval Date: December 12, 1994

See Numeric Index for expiration
and any reaffirmation dates.

Case N-532

**Alternative Requirements to Repair and
Replacement Documentation Requirements and
Inservice Summary Report Preparation and
Submission as Required by IWA-4000 and IWA-
6000¹**

Section XI, Division 1

Inquiry: What alternatives may be used to the requirements of IWA-4910(d) and IWA-6210(e) for completion of Form NIS-2 following repair or replacement, and IWA-6210(c) and (d), IWA-6220, IWA-6230(b), (c), and (d), and IWA-6240(b) for preparation and submittal of the inservice summary report and Form NIS-1?

Reply: It is the opinion of the Committee that as an alternative to the requirements of IWA-4910(d), IWA-6210(c), (d), and (e), IWA-6220, IWA-6230(b), (c), and (d), and IWA-6240(b), the following provisions may be used. This Case shall be utilized at least until the end of the inspection period in which it was invoked.

**1.0 CERTIFICATION OF THE REPAIR OR
REPLACEMENT**

(a) The Owner's Repair/Replacement Program shall identify use of this Case.

(b) A Repair/Replacement Plan shall be prepared in accordance with IWA-4140¹, and shall be given a unique identification number.

(c) Upon completion of all required activities associated with the Repair/Replacement Plan, the Owner shall prepare a REPAIR/REPLACEMENT CERTIFICATION RECORD, FORM NIS-2A.

(d) Form NIS-2A shall be presented to the Inspector for certification.

(e) The completed Form NIS-2A shall be maintained by the Owner.

(f) The Owner shall maintain an index of Repair/Replacement Plans in accordance with IWA-6340. The index shall identify the identification number required by (b) above and the inspection interval and period during which each repair or replacement was completed.

**2.0 OWNER'S ACTIVITY REPORT
PREPARATION AND SUBMITTAL**

An OWNER'S ACTIVITY REPORT FORM OAR-1 shall be prepared and certified upon completion of each refueling outage. Each Form OAR-1 prepared during an inspection period shall be submitted following the end of the inspection period. Each Form OAR-1 shall contain the following:

(a) Abstract of applicable examinations and tests with the information and format of Table 1.

(b) A listing of item(s) with flaws or relevant conditions that required evaluation to determine acceptability for continued service, whether or not the flaw or relevant condition was discovered during a scheduled examination or test. The listing shall provide the information in the format of Table 2.

(c) Abstract for repairs, replacements and corrective measures performed, which were required due to an item containing a flaw or relevant condition that exceeded IWB-3000, IWC-3000, IWD-3000, IWE-3000, IWF-3000, or IWL-3000 acceptance criteria; even though the discovery of the flaw or relevant condition that necessitated the repair, replacement or corrective measure, may not have resulted from an examination or test required by this Division. If acceptance criteria for a particular item is not specified in this Division, the provisions of IWA-3100(b) shall be used to determine which repairs, replacements, and corrective measures are required to be included in the abstract. The abstract shall provide the information in the format of Table 3.

¹All references to IWA-4000 and IWA-6000 used in this Case refer to the 1992 Edition.

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

FORM NIS-2A REPAIR/REPLACEMENT CERTIFICATION RECORD

OWNER'S CERTIFICATE OF CONFORMANCE

I certify that the _____ represent by Repair/Replacement
repair or replacement

Plan number _____ conforms to the requirements of Section XI.

Type Code Symbol Stamp _____

Certificate of Authorization No. _____ Expiration Date _____

Signed _____ Date _____
Owner or Owner's Designee, Title

CERTIFICATE OF INSERVICE INSPECTION

I, the undersigned, holding a valid commission issued by the National Board of Boiler and Pressure Vessel Inspectors and the State or Province of _____ and employed by _____ of _____ have inspected the items described in Repair/Replacement Plan number _____ during the period _____ to _____ and state that to the best of my knowledge and belief, the Owner has performed all the activities described in the Repair/Replacement Plan in accordance with the requirements of Section XI.

By signing this certificate neither the inspector nor his employer makes any warranty, expressed or implied, concerning the activities described in the Repair/Replacement Plan. Furthermore, neither the inspector nor his employer shall be liable in any manner for any personal injury or property damage or loss of any kind arising from or connected with this inspection.

Inspector's Signature Commissions National Board, State, Province, and Endorsements

Date _____

This form (E00126) may be obtained from the Order Dept., ASME, 22 Law Drive, Box 2300, Fairfield, NJ 07007-2300.

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

E

FORM OAR-1 OWNER'S ACTIVITY REPORT

Report Number _____

Owner _____
(Name and Address of Owner)Plant _____
(Name and Address of Plant)Unit No. _____ Commercial service date _____ Refueling outage no. _____
(If applicable)Current inspection interval _____
(1st, 2nd, 3rd, 4th, other)Current inspection period _____
(1st, 2nd, 3rd)

Edition and Addenda of Section XI applicable to the inspection plan _____

Date and revision of inspection plan _____

Edition and Addenda of Section XI applicable to repairs and replacements, if different than the inspection plan _____

CERTIFICATE OF CONFORMANCE

I certify that the statements made in this Owner's Activity Report are correct, and that the examinations, tests, repairs, replacements, evaluations, and corrective measures represented by this report conform to the requirements of Section XI.

Certificate of Authorization No. _____ Expiration Date _____
(If applicable)Signed _____ Date _____
Owner or Owner's Designee, Title

CERTIFICATE OF INSERVICE INSPECTION

I, the undersigned, holding a valid commission issued by the National Board of Boiler and Pressure Vessel Inspectors and the State or Province of _____ and employed by _____ of _____ have inspected the items described in this Owner's Activity Report, during the period _____ to _____, and state that to the best of my knowledge and belief, the Owner has performed all activities represented by this report in accordance with the requirements of Section XI.

By signing this certificate neither the inspector nor his employer makes any warranty, expressed or implied, concerning the examinations, tests, repairs, replacements, evaluations and corrective measures described this report. Furthermore, neither the inspector nor his employer shall be liable in any manner for any personal injury or property damage or a loss of any kind arising from or connected with this inspection.

Inspector's Signature Commissions National Board, State, Province, and Endorsements

Date _____

This form (E00127) may be obtained from the Order Dept., ASME, 22 Law Drive, Box 2300, Fairfield, NJ 07007-2300.

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

TABLE 1
ABSTRACT OF EXAMINATIONS AND TESTS

Examination Category	Total Examinations Required for The Interval	Total Examinations Credited for This Period	Total Examinations Credited (%) For The Period	Total Examinations Credited (%) To Date for The Interval	Remarks
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TABLE 2
ITEMS WITH FLAWS OR RELEVANT CONDITIONS THAT
REQUIRED EVALUATION FOR CONTINUED SERVICE

Examination Category	Item Number	Item Description	Flaw Characterization (IWA-3300)	Flaw or Relevant Condition Found During Scheduled Section XI Examination or Test (Yes or No)
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TABLE 3
ABSTRACT OF REPAIRS, REPLACEMENTS, OR CORRECTIVE MEASURES
REQUIRED FOR CONTINUED SERVICE

Code Class	Repair, Replacement, or Corrective Measure	Item Description	Description of Work	Flaw or Relevant Condition Found During Scheduled Section XI Examination or Test (Yes/No)	Date Complete	Repair/ Replacement Plan Number
---------------	---	---------------------	------------------------	--	------------------	---------------------------------------