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the southern electric system

HL-2962
004125

November 10, 1992

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

PLANT HATCH - UNIT 2
NRC DOCKET 50-366
OPERATING LICENSE NPF-5
REQUEST FOR TEMPORARY TECHNICAL SPECIFICATIONS REVISION:
ALLOW UNIT 1 STANDBY GAS TREATMENT SYSTEM INOPERABILITY
FOR INSTALLATION OF TORUS HARDENED VENT
NRC TAC NOS. M74869 AND M74870

Gentlemen:

In accordance with the provisions of 10 CFR 50.90, as required by 10 CFR 50.59(c)(1), Georgia Power Company (GPC) hereby proposes a temporary change to the Plant Hatch Unit 2 Technical Specifications (TS), Appendix A to Operating License NPF-5.

The proposed change involves temporary revision of the Containment Systems section of the Plant Hatch Unit 2 TS. This temporary revision will allow the Unit 1 standby gas treatment system to be inoperable for a cumulative total of up to 7 days during Unit 2 power operation for the purpose of installing the torus hardened vent per the recommendations of NRC Generic Letter 89-16.

Enclosure 1 provides a detailed description of the proposed change and the reason for the change request.

Enclosure 2 details the bases for our determination the proposed change does not involve a significant hazards consideration.

Enclosure 3 provides page change instructions for incorporating the proposed change. The proposed changed TS pages for Unit 2 follow Enclosure 3. The markup of the proposed change is also included.

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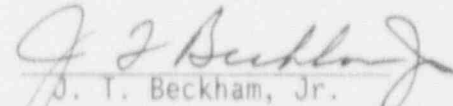
In order to support installation of the Hatch Unit 1 Hardened Vent during the Spring 1993 refueling outage, GPC requests that this proposed Technical Specification change be approved no later than March 10, 1993.

In accordance with the requirements of 10 CFR 50.91, a copy of this letter and all applicable enclosures will be sent to the designated State official of the Environmental Protection Division of the Georgia Department of Natural Resources.

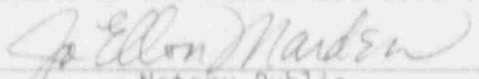
Mr. J. T. Beckham, Jr. states he is duly authorized to execute this oath on behalf of Georgia Power Company, and to the best of his knowledge and belief, the facts set forth in this letter are true.

GEORGIA POWER COMPANY

BY:


J. T. Beckham, Jr.

Sworn to and subscribed before me this 10th day of November 1992.


Notary Public

MY COMMISSION EXPIRES AUGUST 1993

MCM/cr
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Enclosure:

cc: Georgia Power Company
Mr. H. L. Sumner, General Manager - Nuclear Plant
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. Ebnetter, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

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

ENCLOSURE 1

PLANT HATCH - UNIT 2
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BASIS FOR CHANGE REQUEST

PROPOSED CHANGE 1:

The proposed change will temporarily revise Unit 2 Technical Specifications (TS) Section 3.6.6.1 to allow both Unit 1 standby gas treatment system (SGTS) subsystems to be simultaneously inoperable for a cumulative total of up to 7 days to support installation of the torus hardened vent (THV).

BASIS FOR PROPOSED CHANGE 1:

As a result of the NRC Mark I Containment Performance Improvement Program, NRC Generic Letter (GL) 89-16, "Installation of a Hardened Wetwell Vent," strongly encouraged licensees to install a hardened wetwell vent under the provisions of 10 CFR 50.53. By letter dated October 24, 1989, Georgia Power Company responded to GL 89-16 informing the NRC that both Plant Hatch units would install a hardened vent. Plant Hatch utilizes the General Electric Mark I Containment which includes a toroidal wetwell (suppression chamber). Therefore, the proposed hardened vent is commonly referred to as the THV.

The Unit 1 SGTS includes two independent subsystems which both discharge into a common line leading to the main stack. The Unit 1 THV design involves installation of a pipe which bypasses the SGTS filter trains, providing a direct path from the torus to the SGTS discharge line. This pipe will be normally isolated by a closed valve and a zero-leakage rupture disc. The THV modification work will begin with installation of an isolation valve in the inlet line to the SGTS filter trains and installation of a tee in the discharge line. This portion of the job is expected to take approximately 4 days during which time both Unit 1 SGTS subsystems will be inoperable. Once installed, the isolation valve will be closed, the open end of the tee will be temporarily capped, and both SGTS subsystems will be returned to operable status. A majority of the modification work will then be performed with both Unit 1 SGTS subsystems operable. Once the entire THV system is installed, both SGTS subsystems will be removed from service for the final connection of the THV bypass line to the SGTS discharge line. This will be done by removing the temporary cap from the tee and installing the rupture disc between the tee and the THV bypass line. This portion of the work is expected to take approximately one day. This will result in both SGTS subsystems being inoperable simultaneously for a cumulative total of approximately 5 days. In order to account for any possible contingencies, the proposed, cumulative out of service time is 7 days.

ENCLOSURE 1 (Continued)

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This work will be performed during the upcoming Unit 1 refueling outage currently scheduled to begin in March 1993. During the refueling outage, Unit 1 will be in either the Cold Shutdown Condition, Refuel Mode, or defueled. Therefore, per Unit 1 and Unit 2 TS, inoperability of both Unit 1 SGTS subsystems requires suspension of fuel handling and spent fuel shipping cask handling in the Unit 1 secondary containment. However, during performance of the THV installation, Unit 2 is expected to be in Operational Condition 1 (POWER OPERATION). Unit 2 TS Section 3.6.6.1 requires operability of both Unit 2 SGTS subsystems, as well as both Unit 1 SGTS subsystems, when Unit 2 is in Operational Condition 1 (POWER OPERATION), 2 (STARTUP), or 3 (HOT SHUTDOWN), or "When performing inservice hydrostatic or leak testing with the reactor coolant temperature above 212°F." If two of the four SGTS subsystems are inoperable, Action Statement b of Specification 3.6.6.1 requires the Unit 2 reactor to be in HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours. The purpose of this submittal is to temporarily change Unit 2 TS Section 3.6.6.1 to allow both Unit 1 SGTS subsystems to be inoperable for a cumulative total of up to 7 days to support installation of the THV.

The purpose of the SGTS is to treat, and provide an elevated release for, radioactive gases which may be present in the secondary containment (SC) following an accident. The SGTS must also be able to maintain a negative pressure in the SC with respect to the atmosphere to ensure leakage is in the inward direction. The Hatch Unit 2 SC is comprised of the Unit 2 reactor building area, while the Unit 1 SC is normally comprised of the Unit 1 reactor building area and the Unit 1 and Unit 2 common area above the refueling floor.

The Unit 2 TS requirement for operability of two Unit 2 SGTS subsystems and two Unit 1 SGTS subsystems is based on a Unit 2 design basis accident (DBA) loss of coolant accident (LOCA) and takes into consideration the SC design for the two units. Following a DBA LOCA on Unit 2, it is postulated a certain amount of leakage will occur out of the Unit 2 primary containment. Some of this leakage will go into the Unit 2 reactor building area, and some will go up through the shield blocks above the Unit 2 primary containment into the Unit 1 and Unit 2 common area above the refueling floor. Therefore, to contain and treat the radioactive gases postulated to leak out of the Unit 2 primary containment, the SGTS must be able to simultaneously maintain a negative pressure in the SC of both units. Four operable SGTS subsystems can fulfill this requirement given the single failure of one of the subsystems. If one of the four subsystems is inoperable, a 7-day Limiting Condition for operation (LCO) is entered per Action a of Specification 3.6.6.1. If two of the four subsystems are

ENCLOSURE 1 (Continued)

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inoperable, immediate shutdown is required by Action b of Specification 3.6.6.1. Safe Unit 2 operation can be met with only the two Unit 2 SGTS subsystems operable by taking advantage of a Unit 1 TS which allows reconfiguration of the Unit 1 SC.

Unit 1 Specification 3.7.C.2 provides for a reconfiguration of the Unit 1 SC referred to as modified Unit 1 SC. In the modified SC mode, the Unit 1 reactor building area is segregated from the Unit 1 and Unit 2 common area above the refueling floor such that these two air volumes do not communicate. In this configuration, given a Unit 2 DBA LOCA, the SGTS is only required to maintain a negative pressure in the Unit 2 reactor building area and the Unit 1 and Unit 2 common area above the refueling floor. Two of the four SGTS subsystems can maintain a negative pressure in these areas. This will be proven by development and performance of a special test procedure. This test will confirm a negative pressure can be maintained in the Unit 2 reactor building area and the Unit 1 and Unit 2 common area above the refueling floor under the following conditions:

1. The Unit 1 SC is in the modified mode.
2. Both Unit 2 SGTS subsystems are aligned with suction from both of the subject areas and are operating with each filter train flow rate not more than 4000 cfm.
3. Calm wind conditions (< 5 mph) exist.

This test will be performed prior to removing either Unit 1 SGTS subsystem from service after entering the modified mode of Unit 1 SC. This test will be in addition to the normal modified Unit 1 SC capability test required by Unit 1 TS Section 4.7.C.2.a.

During the time when both Unit 1 SGTS subsystems are inoperable for installation of the THV, the Unit 1 SC will be maintained in the modified configuration per Unit 1 Specification 3.7.C.2, and both Unit 2 SGTS subsystems will be maintained operable. This will ensure that, in the extremely unlikely event a Unit 2 DBA LOCA occurs during this time period, radioactive gases which may leak from the Unit 2 primary containment into the Unit 2 reactor building area and the Unit 1 and Unit 2 common area above the refueling floor will be treated by the operable Unit 2 SGTS subsystems, and leakage between these areas and the atmosphere will be in the inward direction. Therefore, SGTS availability will be such that the

ENCLOSURE 1 (Continued)

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BASIS FOR CHANGE REQUEST

design function will be fulfilled, barring the single failure of one SGTS subsystem. A 7-day LCO is justified since it is for Action a of Unit 2 Specification 3.6.6.1.

To provide a greater level of safety, the following compensatory measures will be taken during the time when both Unit 1 SGTS subsystems are inoperable for installation of the THV:

1. Unit 1 CORE ALTERATIONS will not be allowed due to the potential for an inadvertent criticality and the subsequent release of fission product gases into the modified Unit 1 SC.
2. Irradiated fuel handling will not be allowed in the modified Unit 1 SC due to the potential for a bundle drop and the subsequent release of fission product gases into the modified Unit 1 SC.
3. Spent fuel shipping cask handling will not be allowed in the modified Unit 1 SC due to the potential for a cask drop onto irradiated fuel and the subsequent release of fission product gases into the modified Unit 1 SC or a cask drop onto the refueling floor and the subsequent damage to the Unit 1 SC.
4. Unit 2 SC integrity, except for Unit 1 SGTS operability requirements, will be maintained. This will ensure that fission product gases from a postulated Unit 2 DBA LOCA will be contained in the Unit 2 reactor building area.
5. As stated above, Unit 1 SC (modified) integrity, except for Unit 1 SGTS operability requirements, will be maintained. This will ensure fission product gases from a postulated Unit 2 DBA LOCA will be contained in the Unit 1 and Unit 2 common area above the refueling floor.
6. If any of the above requirements cannot be met, Unit 2 will be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

ENCLOSURE 2

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10 CFR 50.92 EVALUATION

The Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license does not involve a significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.

Georgia Power Company has reviewed the proposed amendment and has determined its adoption would not involve a significant hazards consideration. The basis for this determination is given below.

Basis for Proposed No Significant Hazards Consideration Determination:

Evaluation of Proposed Change 1:

This change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The Unit 2 TS requirements for operability of two Unit 2 SGTS subsystems and two Unit 1 SGTS subsystems is based on a Unit 2 DBA LOCA and takes into consideration the secondary containment (SC) design for the two units and the possibility of a single failure. By taking advantage of the Unit 1 specification for modified Unit 1 SC, two Unit 2 SGTS subsystems can contain and treat the leakage of fission product gases from the Unit 2 primary containment following a DBA LOCA, assuming no single failure of a SGTS subsystem occurs. Applying a 7-day LCO in this situation is justifiable because of the low

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10 CFR 50.92 EVALUATION

probability of a DBA LOCA, coupled with the single failure of a SGTS subsystem occurring during this time period. Therefore, this proposed amendment does not involve a significant increase in the consequences of an accident previously evaluated. The SGTS and therefore the SGTS TS, have no impact on the probability of occurrence of any accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

This proposed amendment increases the allowable time limit for operation with both Unit 1 SGTS subsystems inoperable. Operation with the Unit 1 SC in the modified mode has been previously considered, and criteria for such operation are provided by the Unit 1 TS. Therefore, this proposed amendment does not create any new modes of operation or failure, nor does it create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment does not involve a significant reduction in the margin of safety.

The compensatory measures being implemented as part of this proposed amendment will ensure the margin of safety is not significantly reduced. By maintaining the Unit 1 SC in the modified mode, the area which would contain fission product gases following a Unit 2 DBA LOCA is reduced such that only two SGTS subsystems are required to contain and treat these gases. Therefore, applying a 7-day LCO for the condition of two inoperable SGTS subsystems with the Unit 1 SC in the modified mode results in the same risk as a 7-day LCO for the condition of one inoperable Unit 1 SGTS subsystem with the Unit 1 SC in the normal mode, as is required by the current Unit 2 TS. Therefore, this proposed amendment does not involve a significant reduction in the margin of safety.