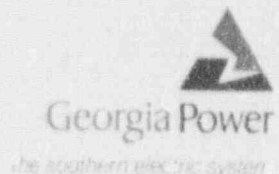


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J. T. Beckham, Jr.
Vice President - Nuclear
Hatch Project



HL-3014
004251

U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
SECOND TEN YEAR INSPECTION INTERVAL
IST PROGRAM SAFETY EVALUATION RESPONSE
NRC TAC NOS. M-59202 AND M-59203

Gentlemen:

By letter dated May 28, 1992, Georgia Power Company (GPC) submitted a proposed schedule for addressing the Appendix A items contained in the Safety Evaluation (SE) issued on GPC's Second 10-Year Inspection Interval IST Program. In the proposed schedule, the Appendix A items were categorized into three tables. Table 1 included items for which GPC is in agreement with the SE. Table 2 included items for which GPC submitted additional justification by letter dated June 5, 1992. Table 3 included items which GPC intended to evaluate and provide a response by November 17, 1992.

In accordance with the submitted schedule, the enclosure provides a response for the items included in Table 3. A response to Section 3.2.3.1 of the SE is also provided in the enclosure. Copies of the revised relief requests reflecting the proposed changes are provided as an attachment to the enclosure.

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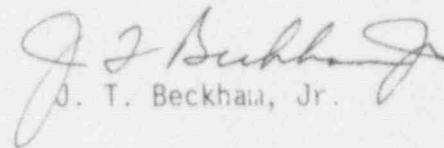
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U.S. Nuclear Regulatory Commission

Page Two

GPC will implement the appropriate IST program changes, as required, within 6 months of receipt of NRC approval. Should you have any questions in this regard, please contact this office.

Sincerely,


J. T. Beckham, Jr.

JKB/cr

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. Ebner, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

ENCLOSURE

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
TABLE 3 ITEMS FROM APPENDIX A

ENCLOSURE

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
TABLE 3 ITEMS FROM APPENDIX A

Background

The enclosure provides a summary listing and GPC's response to the 11 items from Appendix A of the IST Program Safety Evaluation (SE) categorized by GPC as Table 3 items. A response to Section 3.2.3.1 of the SE is also included.

Appendix A Item Number

GPC Response

A7

Item A7 concerns the leak rate testing performed on valves that provide both a containment isolation function and a pressure isolation function. Per the IST program, containment isolation valves (CIVs) and valves serving a dual CIV and pressure isolation valve (PIV) function are tested per 10 CFR 50, Appendix J, and ASME Section XI, paragraphs IWV-3426 and IWV-3427(a). PIVs are leak tested per ASME Section XI, IWV-3420 except for IWV-3427(b). Valves performing a dual CIV/PIV function are tested only to CIV acceptance criteria as it is more stringent than the PIV acceptance criteria.

Item A7 requested the IST program be revised to include documentation for each valve performing a dual CIV/PIV function demonstrating that the Appendix J leak test bounds the ASME Section XI leak test or otherwise verifies the valve's ability to perform its pressure isolation function. GPC has performed the necessary studies and calculations to justify that the Appendix J leak test bounds the Section XI leak test. The study shows that the CIV leak test provides reasonable assurance of the valve's leak tight integrity. This information will be retained in plant records and is available for NRC review.

A10

Relief Request RR-V-39 proposed to measure the stroke time of the scram discharge volume vent and drain valves as a group rather than individually. Item A10 stated that the proposed method does not allow for detection of individual valve degradation and some method should be developed to monitor individual valve condition.

ENCLOSURE (Continued)

TABLE 3 ITEMS FROM APPENDIX A

Appendix A
Item Number

GPC Response

A10 (Continued)

GPC has investigated the possibility of measuring individual stroke times and concluded this method would represent an unnecessary hardship, given the design of the scram discharge volume vent and drain valves. The subject valves are not equipped with individual valve control switches and are controlled by a single test switch, and the test circuit uses an alternate vent path which directly affects the valves' operating time. Consequently, the opening time during normal operation testing is not representative of the actual opening time. Also, full stroke time testing during normal operation would require disabling the Reactor Protection System scram signal to the subject valves. The installation of electrical jumpers and opening links in an energized control circuit results in the potential of a reactor scram.

A11

Relief Requests RR-V-32 and RR-V-40 requested relief from measuring the stroke time of the lift purge supply valves. The valves are not equipped with remote position indicating lights and the valve stem is not observable for position indication. GPC proposed to verify valve movement quarterly by observing a change in the system purge flow rate. Item A11 stated that GPC's proposed testing provides no means of detecting valve degradation and some means should be developed to monitor valve condition.

The relief requests have been revised to provide additional justification and to provide for trending of the local leak rate testing data in an attempt to monitor valve degradation.

A13

Relief Requests RR-V-14 and RR-V-17 requested relief from exercising the RHR injection check valves on a quarterly basis to verify forward flow operability. Plant design does not provide any method for a full flow exercise during normal operation or during normal RHR

ENCLOSURE (Continued)

TABLE 3 ITEMS FROM APPENDIX A

Appendix A
Item Number

GPC Response

A13 (Continued)

operation during shutdown. Item A13 stated that the relief requests provided no justification for not partial-stroke exercising both valves during each cold shutdown and requested GPC to investigate and implement, if practicable, a method to demonstrate that these valves fully open when subjected to shutdown cooling flow.

The relief requests have been revised to provide justification for not partial-stroke exercising both valves during each cold shutdown. The revision also provides for a partial exercise of at least one of these valves each cold shutdown with testing to alternate between valves for each cold shutdown. GPC has also investigated whether the valves can be demonstrated to be fully open when subjected to shutdown cooling flow. For Unit 1, the valves are not full open during RHR operation in the shutdown cooling mode. To full open in this mode, two RHR pumps would be required; however, the net positive suction head requirements are not met with this alignment. Consequently, both valves will be partial-stroke exercised each refueling outage and each check valve will be mechanically exercised in accordance with IWV-3522(b), at each refueling outage, to verify full stroke capability. For Unit 2, the valves have a smaller cross-sectional area and are fully exercised when subjected to shutdown cooling flow. The relief requests have been revised accordingly and copies are attached to the enclosure.

A14

Relief Request RR-V-22 requested relief from exercising and stroke timing the RHKSW heat exchanger outlet valves. Item A14 stated that the proposed testing does not provide for detection of valve degradation and some method should be developed to detect and monitor valve condition. The relief request has been revised to provide additional justification for the proposed testing and to implement comparison time testing per

ENCLOSURE (Continued)

TABLE 3 ITEMS FROM APPENDIX A

Appendix A
Item Number

GPC Response

A14 (Continued)

IWV-3417(a) to detect valve degradation. A copy of the revised relief request is attached to the enclosure.

A15

Relief Requests RR-V-13 and RP-V-16 requested relief from exercising the core spray injection check valves on a quarterly basis to verify forward flow operability. Plant design does not provide a method for full flow exercising of these valves during normal system operation. Item A15 stated that GPC should full stroke exercise these valves using a mechanical exerciser per IWV-3522(b) or verify a full stroke exercise when the valves are subjected to system flow on at least a refueling outage frequency if practical.

Full flow testing of these valves during shutdown conditions is not practical due to the resulting degradation of reactor coolant quality. Consequently, each check valve will be mechanically exercised in accordance with IWV-3522(b), at each refueling outage, to verify full stroke capability. The relief requests have been revised accordingly and copies are attached to the enclosure.

A20

Item A20 concerned the IST program scope for the reactor core isolation cooling system (RCIC) valves. Previously, RCIC system valves, other than those which perform a containment isolation function, could be deleted from the IST program if the accident analysis did not take credit for the RCIC system. GPC's position continues to be that the system should not be included in the IST program as it is not included in any accident analysis.

ENCLOSURE (Continued)

TABLE 3 ITEMS FROM APPENDIX A

Appendix A
Item Number

GPC Response

A22

Relief Request RR-V-20 requested relief from exercising and stroke timing seventeen plant service water power operated valves and proposed to verify proper operation by assigning a maximum stroke time and measuring stroke times by direct observation during quarterly test. These valves are air operated and do not have indicating lights or control switches. Item A22 stated that the proposed tests do not provide for detection of valve degradation and that some method should be developed to detect and monitor valve conditions. Relief Request RR-V-20 has been revised such that the subject valves will be stroke timed by observing actual stem movement when the associated room coolers are placed in service. The requirements of IWV-3413, except as described above, and IWV-3417 will be applied to provide a method to detect and monitor valve condition. A copy of the revised relief request is attached to the enclosure.

A23

Relief Request RR-V-19 requested relief from exercising the high pressure coolant injection (HPCI) system pump room cooler outlet check valves and proposed to sample disassemble, inspect, and manually exercise these valves during refueling outages. The design of the system does not provide a means for positive verification of the flow rate through each valve. Item A23 stated that GPC should partial stroke exercise these valves with flow following disassembly and that GPC should investigate the use of non-intrusive diagnostic techniques to verify these valves full stroke exercise open when subjected to partial flow.

The relief request has been revised and no longer proposes to sample disassemble, inspect, and manually exercise the valves. The relief request references GPC's Plant Service Water System performance monitoring program which performs periodic flow measurements throughout the system to detect potential flow and/or component degradation. The subject pump room coolers are included in the monitoring program. These measurements are typically performed corresponding to each scheduled refueling outage. Temporary ultrasonic

ENCLOSURE (Continued)

TABLE 3 ITEMS FROM APPENDIX A

Appendix A
Item Number

GPC Response

A22 (Continued)

flow measuring instruments are used to obtain the system flow rates and these rates are compared to the design basis acceptance criteria for each location. The monitoring program will confirm that the check valves are capable of performing their safety function. Trending of the flow measurements will provide data which is potentially indicative of check valve degradation.

A24

Relief Request RR-V-41 requested relief from exercising the diesel generator service water outlet check valves and proposed to perform a partial-stroke exercise quarterly and a full-stroke exercise at refueling outages during the diesel generator tests by observing that the diesels are properly cooled. Item A24 stated that GPC had not identified the power levels at which the diesels are operated during the quarterly and refueling outage test and requested GPC to perform a study verifying that the refueling outage diesel test produces a sufficient load on the cooling system to qualify these as a full stroke exercise. Also, GPC was requested to determine if direct flow measurements can be used to verify the flow through these valves.

Relief Request RR-V-41 has been revised to provide the approximate power levels at which the diesels are tested. The diesel testing performed during refueling outages is of sufficient magnitude to confirm that the valves will open sufficiently to perform their design safety function. Additionally, GPC proposes to disassemble, manually exercise, and visually inspect one valve every third refueling outage on a rotating basis.

The flow elements indicated on the P&IDs (P41-N526 and N528) were installed and utilized during construction only. Present Instrument and Controls Department records do not contain flow versus differential pressure curves for these elements; thus, their use for direct flow measurement for IST of the discharge check valves is impractical.

ENCLOSURE (Continued)

TABLE 3 ITEMS FROM /CPH/21X

Appendix A
Item Number

GPC Response

A24 (Continued)

A copy of the revised relief request is attached to the enclosure.

A26

Relief Request RR-V-31 requested relief from measuring the stroke times of the torus to drywell vacuum breaker test valves. Item A26 stated that GPC's proposal provided no means of detecting valve degradation.

A subsequent review has shown that the subject test valves provide no active safety function. The valves are located in the torus to drywell vacuum breaker test circuit. Therefore, these valves have been recategorized as "A passive" in the IST program and are not required to be exercised and stroke timed per ASME Section XI. Consequently, the relief request is not required and is being withdrawn.

SER Item
Section 3.2.3.1

Although this item is not contained in Appendix A, Section 3.2.3.1 of the SE discusses GPC's proposed testing of the main steam safety relief valves. Section 3.2.3.1 stated that GPC has not formally requested relief from measuring the stroke times of these valves and that GPC's proposal does not provide adequate information to monitor valve degradation.

Relief Request RR-V-29 has been revised to provide additional information relative to the valve degradation concern. All pilot operating assemblies and at least one valve body are removed and sent to an independent testing laboratory each refueling outage. Because of the maintenance, testing, and adjustments performed each refueling outage, additional testing methods to detect valve degradation are unwarranted. A copy of the revised relief request is attached to the enclosure.

ATTACHMENT TO ENCLOSURE

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REVISED RELIEF REQUESTS

RELIEF REQUEST

RR-V-32

SYSTEM: TIP System

VALVE: 2C51-F3012

CATEGORY: A

CLASS: 2

FUNCTION: Containment Isolation

TEST REQUIREMENT: IWV-3413 requires that power operated valves be stroke timed quarterly and IWV-3417(b) requires comparison testing.

BASIS FOR RELIEF: This valve is not provided with indicating lights and the valve stem is not observable for position indication. There are no other system provisions other than indirect means (i.e., flow measurement) to determine valve position. Therefore stroke timing is impractical.

This is a rapid acting solenoid valve which if stroke timing was possible, comparison time testing would not be required per the guidance of GL 89-04 Position 6. Per Position 6 of GL 89-04, valves with stroke times of less than or equal to 2 seconds are considered rapid acting valves which do not require comparison time testing.

The nitrogen purge line is relatively small (3/8") and the FSAR evaluation indicates that even in the event of a neutron monitoring instrumentation dry tube failure, the radioactive release would remain within the required limits.

This valve is local leak rate tested (LLRT) at each refueling outage in accordance with 10 CFR 50, Appendix J. LLRT should indicate any problem with the valve seating characteristics which could be indicative of improper valve operation.

ALTERNATE TESTING: Valve will be exercised quarterly and N₂ flow will be observed as an indirect means of determining the required change in position. Observation of N₂ flow confirms valve position only and does not provide data relative to valve stroke time.

RR-V-32 (cont.)

Additionally, the valve is exercised closed each refueling outage and closure is verified by means of 10 CFR 50 Appendix J local leak rate testing (LLRT).

LLRT data will be trended in an attempt to monitor and detect any valve degradation.