

Georgia Power Company  
333 Piedmont Avenue  
Atlanta, Georgia 30308  
Telephone 404 526-3195

Mailing Address  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201  
Telephone 205 868-5086

J. D. Woodard  
Senior Vice President

*the southern electric system*

September 13, 1996

LCV-0603-S

Docket Nos. 50-424  
50-425

Tac Nos. 1 1  
M94132

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT  
PROPOSED CONVERSION OF THE UNIT 1 AND UNIT 2  
TECHNICAL SPECIFICATIONS BASED ON NUREG-1431

By letter dated August 23, 1996, (LCV-0603-R) Georgia Power Company (GPC) submitted improved Technical Specifications (TS) and Bases reflecting, in part, a proposed extended allowed outage time (AOT) for the emergency diesel generators (DGs). However, based on subsequent telephone conversations with the NRC staff, GPC has elected to pursue the proposed extended DG AOT apart from the conversion to the improved TS and Bases. GPC intends that our proposed extended DG AOT of LCV-0603-R remain on the Docket for NRC review, but we request that the conversion to the improved TS and Bases be issued with the current licensing basis 72-hour DG AOT. Therefore, enclosed are: (1) a mark-up of our latest submittal as reflected in LCV-0603-R to show the changes that were made to LCO 3.8.1 and Bases to reinstate the 72-hour DG AOT, and (2) a clean typed copy (hard copy and electronic copy) of the entire improved TS and Bases that reflect the current licensing basis 72-hour DG AOT. Please note that the commitments of LCV-0603-R as they relate to the proposed extended DG AOT as well as verbal commitments made during subsequent telephone conversations and meetings only become applicable upon NRC approval of the proposed extended DG AOT.

In addition, an editorial correction needs to be made to section 5.6.5.a., which lists the LCOs that refer to the Core Operating Limits Report (COLR). LCO 3.9.1, "Boron Concentration" refers to the COLR for the limit on boron concentration of the reactor coolant system,

9609190291 960913  
PDR ADDCK 05000424  
P PDR

AC001/1

refueling canal, and the refueling cavity. Therefore, LCO 3.9.1 needs to be added to section 5.6.5.a. The enclosed TS reflect this change.

By letter dated February 29, 1996, (LCV-0603-J) GPC identified to the NRC a limited number of surveillances that would not be current at the time of implementation of the improved TS. GPC requested that those surveillance requirements (SRs) not be required immediately upon implementation of the Improved TS. They were proposed to instead be required in accordance with specified provisions.

Because of the rescheduled implementation, it is appropriate to adjust the relaxation requested for the surveillance requirement for Unit 2, SR 3.8.1.9. Also, it has been determined that this same SR, SR 3.8.1.9, will also not be current for Unit 1 at the time of implementation due to the conversion to ITS. GPC requests to modify the previous request transmitted in LCV-0603-J by revising the requirements for the SRs stated below such that they will not be required immediately upon implementation of the Improved TS. They will instead be required in accordance with the provisions stated below:

**Unit 1:**

SR 3.8.1.9 - This SR verifies that each DG is capable of withstanding a load rejection of  $\geq 6800$  kW and  $\leq 7000$  kW once per 18 months. The CTS version of this SR, 4.8.1.1.2.h.3, requires that the DG be operating at a load of 7000 kW at the time the load is rejected, however, the Improved TS requires that the DG be operating at  $\geq 6800$  kW and  $\leq 7000$  kW at the time the load is rejected. Therefore, GPC requests that SR 3.8.1.9 not be required prior to entering Mode 4 in the first startup after the 7th Unit 1 refueling. This relief is requested because the CTS and ITS loading requirements are practically mutually exclusive and the CTS requirement was specified for the last performance of the full load rejection test and is more restrictive than the ITS requirement.

**Unit 2:**

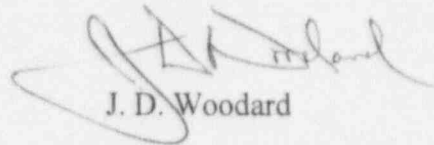
SR 3.8.1.9 - This SR verifies that each DG is capable of withstanding a load rejection of  $\geq 6800$  kW and  $\leq 7000$  kW once per 18 months. The CTS version of this SR, 4.8.1.1.2.h.3, requires that the DG be operating at a load of 7000 kW at the time the load is rejected, however, the Improved TS requires that the DG be operating at  $\geq 6800$  kW and  $\leq 7000$  kW at the time the load is rejected. Therefore, GPC requests that SR 3.8.1.9 not be required prior to entering Mode 4 in the first startup after the 6th Unit 2 refueling. This relief is requested because the CTS and ITS loading requirements are practically mutually exclusive and the CTS requirement was specified for the last performance of the full load rejection test and is more restrictive than the ITS requirement.

Based on the above discussion, GPC requests relief from the aforementioned surveillance requirements. The requests in this letter supercede requests regarding SR 3.8.1.9 in the previous transmittal LCV-0603-J.

In summary, GPC requests the following action from the NRC staff:

1. Issue the improved TS, with the enclosed 72-hour DG AOT, as soon as possible, by September 27, 1996, so that an implementation schedule can be established. (It remains our intent to implement the improved TS within 150 days of the amendment.)
2. Expedite the review of the proposed extended DG AOT, and keep GPC informed of the progress of that review. GPC requests approval of the proposed extended DG AOT by December 31, 1996, to facilitate planning for 1997.
3. Provide the requested relief from the aforementioned surveillance requirements.

Sincerely,



J. D. Woodard

JDW/NJS

Enclosures

xc: Georgia Power Company  
Mr. C. K. McCoy  
Mr. J. B. Beasley, Jr.  
Mr. M. Sheibani  
NORMS

U. S. Nuclear Regulatory Commission  
Mr. S. D. Ebnetter, Regional Administrator  
Mr. L. L. Wheeler, Licensing Project Manager, NRR  
Mr. C. R. Ogle, Senior Resident Inspector, Vogtle