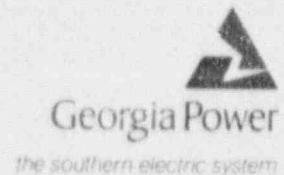


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C. K. McCoy  
Vice President, Nuclear  
Vogtle Project



February 2, 1993

ELV-05045  
000669

Docket Nos. 50-424  
50-425

TAC-M84474  
M84475

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT  
REQUEST TO REVISE TECHNICAL SPECIFICATION 4.8.1.1.2.h.7

By letter dated August 31, 1992, (ELV-03841) Georgia Power Company (GPC) proposed to amend the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications to separate the loss of offsite power (LOOP) engineered safety feature actuation system (ESFAS) test (surveillance requirement (SR) 4.8.1.1.2.h.6) from the 24-hour full-load-carrying capability test (SR 4.8.1.1.2.h.7). Surveillance requirements 4.8.1.1.2.h.6 and 4.8.1.1.2.h.7 would have been affected by the proposed change. As a result of a telephone conversation with the NRC staff, GPC has agreed to revise our proposed amendment of August 31, 1992, as described in enclosures 1, 2, and 3.

Sincerely,

*CKM'g*  
C. K. McCoy

CKM/NJS

Enclosures:

1. Basis for Proposed Change
2. 10 CFR 50.92 Evaluation
3. Marked Up Page

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ADD 1

U. S. Nuclear Regulatory Commission  
Request to Revise Technical Specifications  
ELV-05045  
Page 2

c(w): Georgia Power Company  
Mr. W. B. Shipman  
Mr. M. Sheibani  
NORMS

U. S. Nuclear Regulatory Commission  
Mr. S. D. Ebnetter, Regional Administrator  
Mr. D. S. Hood, Licensing Project Manager, NRR  
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

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

## ENCLOSURE 1

### VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATION 4.8.1.1.2.h.7

#### BASIS FOR PROPOSED CHANGE

##### Proposed Change

The Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications (TS) require, in part, that the diesel generators (DGs) be tested at least once per 18 months, during shutdown, by operating the DGs at specified loads for 24 hours (surveillance requirement (SR) 4.8.1.1.2.h.7). Within 5 minutes after completing this 24-hour test, the DGs are to be subjected to another test by simulating a loss of offsite power (LOOP) in conjunction with an engineered safety feature actuation system (ESFAS) test signal and verifying the loading sequence. The DG is to be operated for at least 5 minutes while loaded with the emergency loads (SR 4.8.1.1.2.h.6). However, if the second test is not successfully completed, the 24-hour test does not have to be repeated. Instead, the DG may be operated at the load specified by SR 4.8.1.1.2.a.5 for 1 hour or until the DG operating temperature has stabilized, prior to reperforming the LOOP/ESFAS test.

The proposed change would remove the requirement to perform the LOOP/ESFAS test within 5 minutes after completing the 24-hour test and substitute the requirement to start the DG in accordance with SR 4.8.1.1.2.a.4 within 5 minutes after the 24-hour test. In addition, if the start after the 24-hour test was unsuccessful, footnote ## to SR 4.8.1.1.2.h.7 would be revised to require the DG to be operated for a minimum of 2 hours at the load specified by SR 4.8.1.1.2.a.5 prior to repeating the start pursuant to SR 4.8.1.1.2.a.4. As provided in the existing TS, the 24-hour test would not have to be repeated simply because the subsequent start was unsuccessful.

##### Basis

The existing surveillance requirements are derived from Regulatory Guide 1.108, Revision 1, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," which provides guidelines for monitoring DG performance and reliability via an assortment of periodic tests. The basis for the existing requirement to perform a LOOP/ESFAS test within 5 minutes of completing the 24-hour test is to demonstrate hot restart capability under full-load operating temperature conditions. However, it is not necessary to perform the LOOP/ESFAS test within 5 minutes of the 24-hour test to demonstrate the hot restart capability of the DG. Simply starting the DG and verifying that it achieves the required voltage and frequency within the required time is sufficient to ensure hot restart capability. Furthermore, if the hot restart subsequent to the 24-hour test should be unsuccessful, requiring the DG to be operated at the loads specified by SR 4.8.1.1.2.a.5 for a minimum of 2 hours prior to repeating the hot restart test will provide additional assurance that the DG has achieved full-load operating temperature. Therefore the proposed amendment is consistent with the intent of Regulatory Guide 1.108.

## ENCLOSURE 1

### VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATION 4.8.1.1.2.h.7

#### BASIS FOR PROPOSED CHANGE

In addition, the proposed amendment would provide additional flexibility for outage planning and execution. Under the existing requirement, the 24-hour test, in combination with the LOOP/ESFAS test, must be scheduled at a time during the outage when all of the DG emergency loads are operable and capable of satisfying the requirements of the LOOP/ESFAS test. Under the terms of the proposed amendment, these surveillance tests could be scheduled independently, thereby improving outage scheduling and execution.

Finally, the proposed amendment is also supported by the April 1992 draft Revision 3 to Regulatory Guide 1.9, "Selection, Design, Qualification, Testing, and Reliability of Emergency Diesel Generator Units Used as Class 1E Onsite Electric Power Systems at Nuclear Power Plants." This guidance describes a "Hot Restart Test" which simply requires the DG to be started from full-load temperature conditions by a manual or autostart signal. This test is not the LOOP/ESFAS test currently specified by the VEGP TS.



## ENCLOSURE 2

### VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATION 4.8.1.1.2.h.7

#### 10 CFR 50.92 EVALUATION

Pursuant to 10 CFR 50.92, GPC has evaluated the proposed amendment and has determined that operation of the facility in accordance with the proposed amendment would not involve a significant hazards consideration. The basis for this determination is as follows:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. Separating the 24-hour test from the LOOP/ESFAS test and revising footnote ## will have no effect on the initiating events assumed for any existing accident analysis. The basis for the existing requirement is to ensure the hot restart capability of the DGs. The proposed change in requirements will continue to demonstrate that capability, and the DGs will remain able to perform their safety function as assumed in the accident analyses. Should the hot restart test subsequent to the 24-hour test fail, the change to footnote ## will provide additional assurance that the DG has achieved full-load operating temperature prior to repeating the hot restart test. Therefore, the DGs will continue to be able perform their safety function and there will be no effect on the consequences of any existing accident analyses.
2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The change does not introduce any new equipment into the plant or require any existing equipment to be operated in a manner different than that for which it was designed to operate. The proposed change will continue to demonstrate the hot restart capability of the DGs. Therefore, the performance, reliability, or capability of the DGs to perform their design function will not be affected.
3. The proposed change does not involve a significant reduction in a margin of safety. The basis for the existing requirement is to ensure the hot restart capability of the DGs. The proposed change will continue to ensure that capability, thereby maintaining the margin of safety afforded by the existing surveillance requirements.

Based on the preceding analysis, GPC has determined that the proposed change to the Technical Specifications will not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. Georgia Power Company therefore concludes that the proposed change meets the requirements of 10 CFR 50.92(c) and does not involve a significant hazards consideration.