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the southern electric system

NED-85-358
1649N

May 20, 1985

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz, Chief
Operating Reactors Branch No. 4
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

NRC DOCKET 50-321
OPERATING LICENSE DPR-57
EDWIN I. HATCH NUCLEAR PLANT UNIT 1
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
PROPOSED CHANGES TO SPECIAL REPORTING REQUIREMENTS

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 changes to the Technical Specifications, Appendix A to Operating License DPR-57.

These proposed changes would delete from Plant Hatch Unit 1 Technical Specifications Table 6.9.2-1, requirements to report results of secondary containment leak rate tests and summaries of primary coolant leakage to the drywell.

Attachment 1 provides a detailed description of the proposed changes and circumstances necessitating the change request.

Attachment 2 details the basis for our determination that the proposed changes do not constitute an unreviewed safety question.

Attachment 3 details the basis for our determination that the proposed changes do not involve significant hazards considerations.

Attachment 4 provides page change instructions for incorporating the proposed change.

The proposed changed Technical Specification pages follow Attachment 4.

Payment of filing fee is enclosed.

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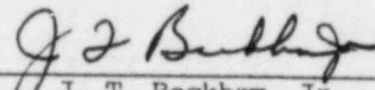
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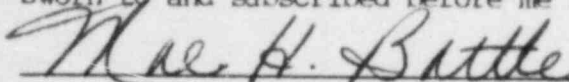
Pursuant to the requirements of 10 CFR 50.91, Mr. J. L. Ledbetter of the Environmental Protection Division of the Georgia Department of Natural Resources will be sent a copy of this letter and all applicable attachments.

J. T. Beckham, Jr. states that he is Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that 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 20th day of May, 1985.


Notary Public, Georgia, State at Large
My Commission Expires Sept. 18, 1987
Notary Public

CRP/REB/mb

Enclosure

xc: H. C. Nix, Jr.
Senior Resident Inspector
J. N. Grace, (NRC-Region II)
J. L. Ledbetter

ATTACHMENT 1

NRC DOCKET 50-321
OPERATING LICENSE DPR-57
EDWIN I. HATCH NUCLEAR PLANT UNIT 1
BASIS FOR CHANGE REQUEST

Plant Hatch Unit 1 Technical Specification 6.9.2 requires, per Table 6.9.2-1, that a summary technical report of the secondary containment integrated leak rate test be submitted within three months following conduct of that test and that a report of primary coolant leakage into the drywell be submitted every five years. The proposed change would delete requirements for these reports from the Technical Specifications.

These reporting requirements were part of the original issue of the Hatch Unit 1 Technical Specifications, dated August 6, 1974. It is believed that the reports may have been required at the time to augment NRC's data base on containment performance. However, since that time, reporting requirements have significantly changed. Neither the Plant Hatch Unit 2 Technical Specifications nor GE BWR 4 Standard Technical Specifications contain requirements for submittal of these reports.

Table 6.9.2-1 requires that the integrated leak rate test of secondary containment include such parameters as wind speed, wind direction, outside and inside temperatures during the test, concurrent reactor building pressure, and emergency ventilation flow rates. Although this report is defined in Table 6.9.2-1, there is no requirement in the Technical Specifications or in the existing codes, standards, and regulations for Plant Hatch Unit 1 for the performance of such a test. Plant Hatch Unit 1 Technical Specification 4.7.C requires tests at appropriate times to demonstrate secondary containment operability by maintaining 1/4 inch of H₂O vacuum in secondary containment, but there is no requirement to perform an integrated leak rate test or to monitor various atmospheric parameters while performing such a test. Since no such test is defined or required, we propose that the associated reporting requirement be deleted from the Technical Specifications.

Table 6.9.2-1 also requires that primary coolant leakage to the drywell be reported to the NRC once every five years. However, there is no definition or requirement of what should be in that report. Specific requirements and action statements exist in Technical Specification 3.6.G to stringently monitor and control the reactor coolant leakage into the drywell. Plant shutdown and NRC notification are required if the specified leakage rates are exceeded.

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ATTACHMENT 1 (Continued)

As noted above, specifications exist for both maintaining secondary containment integrity and maintaining limits on reactor coolant leakage into the drywell. The NRC has defined appropriate reporting requirements for the Technical Specifications in 10 CFR 50.73, which requires reporting in the event that specified leakage rates are exceeded. GPC therefore believes that the reports proposed to be deleted are superfluous. The only presently unreported area these reports would cover would be the test results of the routine maintenance of secondary containment integrity and the routine reactor coolant leakage to the drywell. Therefore, GPC requests that the NRC delete the requirement for submittal of these two reports from the Plant Hatch Unit 1 Technical Specifications.

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ATTACHMENT 2

NRC DOCKET 50-321
OPERATING LICENSE DPR-57
EDWIN I. HATCH NUCLEAR PLANT UNIT 1
10 CFR 50.59 EVALUATION

Pursuant to 10 CFR 50.59, the Plant Review Board and Safety Review Board have reviewed the attached proposed amendment to the Plant Hatch Unit 1 Technical Specifications and have determined that implementation of the proposed change does not constitute an unreviewed safety question.

The probability of occurrence and the consequences of an accident or malfunction of equipment important to safety are not increased above those analyzed in the FSAR since the proposed change involves only administrative reporting requirements. In addition, only reporting requirements dealing with routine operation of secondary containment operation or reactor coolant leakage to drywell would be deleted. All abnormal events would be reported through the requirements of 10 CFR 50.73, as appropriate.

The possibility of an accident or malfunction of a different type than analyzed in the FSAR does not result because no changes to the plant modes of operation are being proposed.

The margin of safety as defined in the Technical Specifications is unaffected by deletion of this administrative requirement.

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ATTACHMENT 3

NRC DOCKET 50-321
OPERATING LICENSE DPR-57
EDWIN I. HATCH NUCLEAR PLANT UNIT 1
10 CFR 50.59 EVALUATION

Pursuant to 10 CFR 50.92, Georgia Power Company has evaluated the attached proposed amendment for Plant Hatch Unit 1 and has determined that its adoption would not involve a significant hazard. The basis for this determination is as follows:

This change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the Federal Register, April 6, 1983. Item (i) is defined as an administrative change to the Technical Specifications. Since the proposed change would delete reporting requirements in the Technical Specifications which provide the NRC with the routine testing results of secondary containment integrity and reactor coolant into the drywell (Abnormal test results would be covered under 10 CFR 50.73), it is consistent with item (i).

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