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NED-85-518
1872N

August 1, 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 AMEND INSERVICE INSPECTION
TECHNICAL SPECIFICATIONS

Gentlemen:

In our letter NED-85-483, dated June 25, 1985, Georgia Power Company (GPC) advised the NRC of our intent to revise our heretofore unapproved October 3, 1978, submittal of proposed Technical Specification changes for the Hatch Unit 1 inservice inspection program. In that letter we requested that the NRC not act on that submittal. Since the proposed Technical Specification changes are still needed and unrelated amendments have been issued to some of the affected pages subsequent to our October 3, 1978 submittal, it is necessary to revise and re-submit the previously proposed changes. Consequently, and in accordance with the provisions of 10 CFR 50.90 as required by 10 CFR 50.59(c)(1), GPC hereby re-submits a request to amend Plant Hatch Unit 1 Technical Specifications (Appendix A to Operating License DPR-57) to update the inservice inspection requirements pursuant to 10 CFR 50.55a(g)(4)(ii).

The proposed changes "modernize" and supercede those submitted in our October 3, 1978 letter. Instructions for the proposed changes are included as Enclosure 1. As NRC will note, the proposed changes are similar to those submitted previously. However, several new proposed changes are incorporated in this submittal. The significant changes to the original submittal and the bases are identified in Enclosure 2.

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In accordance with NRC's previous recommendations, GPC has incorporated standard language referencing 10 CFR 50.55a(g) in place of existing inservice inspection and testing requirements. However, in lieu of simply referencing 10 CFR 50.55a(g), which would incorporate the additional surveillance requirements required by ASME Section XI in conjunction with those that presently exist in the Technical Specifications, we have taken the approach of patterning the proposed changes after the requirements of Standard Technical Specifications (STS). This approach results in some requirements being more restrictive while others will be less restrictive than those currently in the Technical Specifications.

As a point of clarification, STS do not require safety-related components (e.g., ECCS, service water, etc.) to be demonstrated operable when a redundant or associated safety-related component is declared inoperable. The surveillance requirements which are proposed to be applicable are only those normally performed in accordance with ASME Section XI pursuant to 10 CFR 50.55a(g). Although the STS requirements are less restrictive than the existing Technical Specifications in this respect, it should be noted that the normal testing required by ASME Section XI is significantly more comprehensive than the present testing requirements identified in the existing Technical Specifications. Therefore, the net result using the STS approach is judged to be an equivalent or more reliable testing program.

The proposed changes have been reviewed and approved by the Plant Review Board and have been determined not to constitute an unreviewed safety question. The probability of occurrence or the consequences of an accident or malfunction of equipment important to safety would not be increased above those analyzed in the FSAR because the operation of safety-related equipment is not affected by the proposed changes. The possibility of an accident or malfunction of a different type than any analyzed in the FSAR would not result from these changes because no new mode of failure is introduced. The proposed changes to the Technical Specifications will enhance the reliability of the Inservice Inspection limiting conditions for operation and the surveillance requirements; thus, the margin of safety would not be reduced by these proposed changes. A more detailed safety evaluation as required by 10 CFR 50.59 is included herein as Enclosure 3.

The proposed changes have been evaluated not to involve significant hazards consideration. While a significant hazards review as currently required by 10 CFR 50.92 was not required at the time of the original submittal, the subject evaluation is provided herein as Enclosure 4 for this re-submittal.

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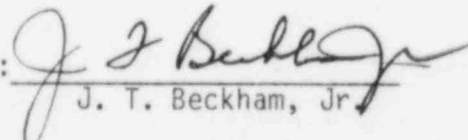
The proposed Technical Specification changes are needed in part to help support completion of the ten-year inservice inspection interval during the Hatch Unit 1 maintenance/refueling outage scheduled to begin November 30, 1985. As a result, GPC requests that NRC take prompt action to review and approve the proposed Technical Specification changes enclosed herein. Your response to this re-submittal is requested within thirty days of receipt this letter. We will give top priority to answering questions related to this submittal.

Nineteen (19) copies of this submittal are enclosed for your convenience. An amendment application fee pursuant to 10 CFR 170 is not enclosed since our October 3, 1978, included the amendment fee of \$4,000.00 required at that time for review of the proposed Technical Specification changes.

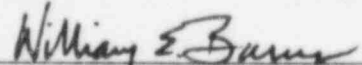
Pursuant to the requirements of 10 CFR 50.92, J. L. Ledbetter of the Georgia Department of Natural Resources will be sent a copy of this letter and all applicable enclosures.

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 1st day of August, 1985.



Notary Public, Georgia, State at Large
JAE/mb My Commission Expires Aug. 26, 1986

Enclosure: 1. Proposed Changes to Technical Specifications
2. Significant Changes from October 3, 1978 Submittal
3. Safety Evaluation
4. Significant Hazards Review

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