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NED-85-346  
1617N

August 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 DOCKETS 50-321, 50-366  
OPERATING LICENSES DPR-57, NPF-5  
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2  
PURGE AND VENT MODIFICATIONS

Gentlemen:

In accordance with the provisions of 10 CFR 50.90 as required by 10 CFR 50.59(c)(1), Georgia Power Company hereby proposes changes to the Technical Specifications, Appendix A to Operating Licenses DPR-57 and NPF-5.

The proposed changes modify those described in our letter of June 15, 1983. The proposed amendment would add surveillance requirements for the fast acting dampers in the Standby Gas Treatment System (SGTS), which were installed during the most recent refueling outage on Unit 2 and are to be installed during the upcoming refueling outage on Unit 1.

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.

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Director of Nuclear Reactor Regulation  
Attention: Mr. John F. Stolz, Chief  
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Page Two

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

The proposed changed Technical Specification pages follow Attachment 4.

Since this submittal is an amendment to a previous submittal for which an amendment fee was submitted, no application fee is required.

In order to allow time for procedure revision and orderly incorporation into copies of the Technical Specifications, we request that the proposed amendment, once approved by the NRC, be issued with an effective date to be no later than 30 days from the date of issuance of the amendment.

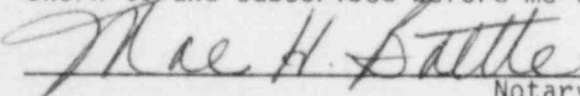
Pursuant to the requirements of 10 CFR 50.92, J. L. Ledbetter of the Georgia Department of Natural Resources will be sent a copy of this letter and all applicable attachments.

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 August, 1985.

  
Mae H. Battle

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

MJB/mb

Enclosure

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

Attachment 1  
NRC DOCKETS 50-321, 50-366  
OPERATING LICENSES DPR-57, NPF-5  
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2  
PURGE AND VENT MODIFICATIONS  
Description of Proposed Changes to  
Technical Specifications

The proposed changes modify those described in our letter of June 15, 1983. The proposed amendment would add surveillance requirements for the fast acting dampers in the Standby Gas Treatment System (SGTS) installed during the most recent refueling outage on Unit 2 and to be installed on Unit 1 during the next refueling outage, scheduled for the Fall of 1985. In addition, this submittal clarifies the wording of one of the proposed changes to the Technical Specifications submitted in our letter of June 15, 1983. The commitment for valve operability for Unit 1 remains in effect as stated in our letter of October 1, 1982, until the installation of the fast acting dampers on that Unit.

Unit 2 was licensed with a restriction imposed on the amount of time that the 18" purge and vent isolation valves could be open. In subsequent discussions with the staff it was determined that if: 1) a site specific dose analysis was submitted; 2) measures were taken to protect downstream structures; and 3) 18" valve operability was demonstrated for Design Basis Earthquake conditions; then the restriction could be lifted. The dose analysis and the valve operability data, with the exception of the seismic test results summary, were submitted in our letter of May 31, 1983. The details of the design modifications and a summary of the seismic test data were submitted June 15, 1983. In order to resolve issue (D) of your July 7, 1982, letter, GPC has installed redundant, safety-grade fast acting, excess flow isolation dampers which will automatically isolate the common 18" vent line from the torus and drywell before it ties into the SGTS filter train suction for Unit 2. Excess flow isolation dampers will be installed on Unit 1 during the outage scheduled to begin on November 30, 1985, in the same systemic orientation. To assure that post-LOCA venting capabilities are maintained with the worst single failure, a 2-inch bypass line has been installed around the isolation dampers. The purpose of the change submitted June 15, 1983, was to specify operability requirements without limiting the 18 inch purge and vent isolation valves to a 1% time limitation.

The purpose of this submittal is to specify surveillance requirements for the fast acting dampers. The dampers are a passive device designed to close at a small percentage of DBA-LOCA flow. Based on the manufacturer's suggestion, there is no need for testing beyond visual inspection for deformation of parts, free operation of linkage and position indication once a refueling cycle. Current Unit 2 Technical Specifications require that four of four SGTS filter trains for both Units be OPERABLE unless both Units

are in Cold Shutdown. The proposed change would allow both Unit 2 trains of SGTS temporarily to be inoperable to allow for surveillance testing of Unit 2 dampers while both trains of Unit 1 SGTS were operable and with Unit 2 in Operational Condition 4 or 5. The conditions imposed on the Limiting Condition for Operation are the same as those required during the installation of the dampers which were agreed to by members of NRC staff and GPC except that the condition that no fuel be in the vessel has been deleted. Unit 1 Technical Specifications will not need to be changed with respect to the operability of either Unit 1 and Unit 2 SGTS because drawdown of the secondary containment will be unaffected by the Unit 1 damper installation or surveillance.

Due to the addition of the damper surveillance as a separate specification the numbering of the Specification submitted June 15, 1983, has changed. The proposed change also clarifies the wording for specification 3.6.6.5.1.a submitted June 15, 1983. Specifically, it changes the wording "Each valve may be open for purge system operation for inerting, deinerting and pressure control" to "Each valve closed except for purge system operation for inerting, deinerting and pressure control". This change eliminates a potential misinterpretation of the intent of the specification.

For clarity, the Technical Specification pages affected by the installation of the dampers submitted June 15, 1983, but unchanged by this submittal, are included in this submittal and so noted on attachment 4. Other pages will reflect both changes submitted June 15, 1983, and damper surveillance requirements.

Attachment 2

NRC DOCKETS 50-321, 50-366  
OPERATING LICENSES DPR-57, NPF-5  
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2  
PURGE AND VENT MODIFICATIONS

Determination of No Unreviewed Safety Question

The Plant Review Board and Safety Review Board have reviewed the proposed changes and have determined that they do not constitute an unreviewed safety question. The purpose of this change is to specify surveillance requirements for the fast acting dampers. The surveillance requirements have no detrimental effect on plant or equipment operation because they impose no new operational constraints. Due to the completion of the installation of the fast acting dampers on Unit 2, the possibility for the existing scenario which could have caused damage to the SGTS has been eliminated. While the probability of the initiating accident is unchanged, the consequences are reduced. The modification described by the Technical Specification change creates no possibility of new accidents or malfunctions which would inhibit the design function of SGTS. The overall effect of the change is to increase the margin of safety as defined in the bases of the Technical Specification. The same will apply to Unit 1 following the installation of fast acting dampers during the upcoming Unit 1 outage.



Attachment 3

NRC DOCKETS 50-321, 50-366  
OPERATING LICENSES DPR-57, NPF-5  
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2  
PURGE AND VENT MODIFICATIONS

Determination of No Unreviewed Safety Question

The proposed amendment constitutes: an administrative change in that it changes the numbering of existing and outstanding proposed Technical Specifications. Due to the addition of the damper surveillance as a separate specification the numbering of the Specification submitted June 15, 1983, has changed. It also changes the numbering of an existing Unit 1 Specification to reduce any potential misinterpretation as to the applicability of the limiting condition of operation. Therefore, the results of the changes are 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 April 6, 1983, issue of the Federal Register.

The proposed amendment constitutes: an administrative change in that it clarifies the wording for Plant Hatch Unit 2 Technical Specification 3.6.6.5.1.a in a previous submittal. Specifically it changes the wording "may be open" to "closed except". Therefore, the results of the changes are 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 April 6, 1983, issue of the Federal Register.

The purpose of this submittal is to specify surveillance requirements for the Unit 1 and Unit 2 fast acting dampers. Thus, the proposed amendment constitutes: additional restrictions in that it proposes additional surveillance requirements. Therefore, the results of the changes are consistent with Item (ii) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.

The proposed amendment constitutes: relief granted upon demonstration of acceptable operation in that acceptable operation was not demonstrated for Unit 2 SGTS until installation of the fast acting dampers was complete. Specifically, the 1% limitation on drywell and suppression chamber purge and exhaust 18" isolation valves is being removed because of the installation of the fast acting dampers. Similarly, the commitment on Unit 1 to limit the isolation valves to being open less than 1% of the time is being rescinded. Therefore, the results of the changes are consistent with Item (iv) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register.