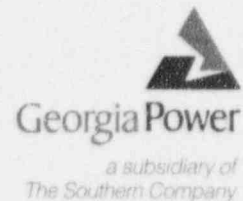


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J. T. Beckham, Jr.
Vice President - Nuclear
Hatch Project



November 18, 1996

Docket Nos. 50-321
50-366

HL-5259

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

Edwin I. Hatch Nuclear Plant
Third 10-Year Interval Inservice Inspection Program
Request for Additional Information

Gentlemen:

By letter dated October 17, 1995, Georgia Power Company (GPC) submitted the Third 10-Year Interval Inservice Inspection (ISI) Program for the Edwin I. Hatch Nuclear Plant. By letters dated January 26, 1996, April 5, 1996, and August 13, 1996, GPC responded to NRC requests for additional information. By letter dated October 23, 1996, NRC requested additional information concerning Relief Requests RR-13 and RR-16. The NRC specific comments and GPC's response are enclosed.

Should you have any questions in this regard, please contact this office.

Sincerely,

J. T. Beckham, Jr.

IFL/eb

Enclosures:

1. NRC Specific Comments and GPC Response
2. Third 10-Year Interval Request for Relief No. RR-16 Rev. 1

cc: (See next page.)

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U. S. Nuclear Regulatory Commission
November 18, 1996

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cc: Georgia Power Company
Mr. H. L. Sumner, Nuclear Plant General Manager
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. K. Jabbour, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebnetter, Regional Administrator
Mr. B. L. Holbrook, Senior Resident Inspector - Hatch

Idaho National Engineering Laboratory
Michael T. Anderson

Enclosure 1

Edwin I. Hatch Nuclear Plant
Request for Additional Information
NRC Specific Comments and GPC Response

NRC specific comments:

1. In Request for Relief RR-13, GPC has requested relief from performing the Code-required VT-2 visual examination during System Functional and System Inservice Pressure Tests for the subject containment penetration piping classified as Code Class 2. The NRC staff's position is that the use of Code Case N-522 is acceptable with the following conditions: the test is conducted at the peak calculated containment pressure, and the test procedure permits the detection and location of through-wall leakage in containment isolation valves (CIVs) and pipe segments between the CIVs.
2. In Request for Relief RR-16, GPC requested relief from performing a pneumatic pressure test of SRV B21-F013 discharge piping. The staff's position is that the proposed request must include the verification of discharge piping integrity each period by VT-3 visual examination to provide reasonable assurance of the operational readiness of the subject piping.

GPC response:

1. The existing Plant Hatch leakage rate testing procedures perform Appendix J testing of the applicable penetrations at the calculated peak accident pressure and the acceptance criteria provide for detection and location of any unacceptable through-wall leakage in containment isolation valves (CIVs) and pipe segments between the CIVs. Therefore, the existing leakage rate testing implemented at Plant Hatch is commensurate with the NRC's position.
2. The attached revised Request for Relief, RR-16 Rev. 1, provides for additional visual examinations being added to the ISI Plans (i.e., VT-3 examination of the accessible portions of the SRV discharge piping each 40-month inspection period).

Enclosure 2

Georgia Power Company
Hatch Nuclear Plant, Units 1 & 2
Third 10-Year Interval
Request for Relief No. RR-16

- I. System/Component for Which Relief is Requested: Class 3 (Category D-A, Item Number D1.10) safety relief valve (SRV) piping which discharges into the suppression pool.
- II. Code Requirement: ASME Code Section XI, IWD-5223(f) requires performance of a pneumatic pressure test at a pressure of 90% of the pipe submergence head of water, for SRV piping which discharges into the suppression pool.
- III. Code Requirement for Which Relief is Requested: Relief is requested from performing a pneumatic pressure test of the SRV (B21-F013s) discharge piping.
- IV. Basis for Relief: The SRV discharge piping is 10 inches in diameter, has a design pressure rating of 448 psig for Unit 1 and 500 psig for Unit 2, and has a submergence head of approximately 10 feet. The resultant pneumatic pressure test would be performed at approximately 4 psig. Performing a pressure test at $< 1/100$ of the design pressure serves no useful purpose associated with pressure boundary or structural integrity of the SRV discharge piping.

The inspection associated with a pneumatic test usually consists of solution film testing of the test boundary, or some other inspection/test methods (e.g., sonic gun) which must be demonstrated to the satisfaction of the ANII. The majority of the discharge piping is not accessible because of the lack of permanent scaffolding in the drywell and portions of the piping are located in the drywell to suppression pool vent headers. Much of the piping in the drywell is in high radiation areas due to its proximity to reactor recirculation piping and pumps. Therefore, only a limited portion of the piping is accessible for solution film testing, or for any other method of inspection, without significant increases in manpower, radiation exposure, and budget.

Based on the above discussion, performing a pneumatic pressure test of the SRV discharge piping in accordance with the 1989 ASME Code Section XI is impractical and will not result in a compensating increase in the level of quality and safety.

- V. Alternate Examination: The accessible portions of the SRV discharge piping will be visually examined (VT-3) at least once each 40-month inspection period to provide reasonable assurance of the structural integrity of the piping. The associated piping supports are examined in accordance with the ASME Section XI requirements.

Enclosure 2

Third 10-Year Interval

Request for Relief No. RR-16

- VI. Justification for Granting Relief: Pressure testing the SRV discharge piping does not result in a significant safety benefit for normal operation or shutdown of the plant. The ASME Code Section XI Committee agreed with the position stated herein. The requirement to perform the pressure testing was deleted in the 1995 Code Edition. Paragraph IWD-5240 was added in the 1995 Edition exempting SRV discharge piping, as well as all open-ended discharge piping, from examination requirements.
- VII. Implementation Schedule: The relief request is applicable for the Third 10-Year Interval.