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August 30, 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 50-366
OPERATING LICENSE NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNIT 2
PROPOSED CHANGES TO TECHNICAL SPECIFICATION TABLE 3.8.2.6-1

Gentlemen:

Our submittal of May 9, 1985 proposed a general revision to Plant Hatch Unit 2 Technical Specification Table 3.8.2.6-1, Primary Containment Penetration Overcurrent Protective Devices. This letter provides additional information regarding that submittal at the request of the NRC Licensing Project Manager.

The proposed change would delete from Table 3.8.2.6-1 all information contained in the TRIP SETPOINT and RESPONSE TIME columns, and specify NEMA Standard AB2-1980 as the testing requirement for molded case circuit breakers.

TRIP SETPOINT and RESPONSE TIME information would be deleted for both types of protective devices listed in the subject table: the 4 KV circuit breakers for the recirculation pump motor-generator drive motors, and the lower voltage molded case circuit breakers. Surveillance requirements for these two types of breakers are specified in Technical Specifications 4.8.2.6.1.a.1 and 4.8.2.6.1.a.2, respectively. Descriptive information, including system voltage, will be retained to clarify which testing requirements apply to each listed device.

The degree and type of testing for any given breaker will not be affected by this change. Listing of TRIP SETPOINTS for each breaker represents an unnecessary level of detail and requires frequent Technical Specification revisions whenever electrical devices are changed inside containment. The design basis for this requirement is protection of the primary containment penetration from thermal damage due to overcurrents. However, as detailed in our May 9, 1985 letter, listed TRIP SETPOINTS are

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based on protection of equipment in the containment, which is not a safety consideration and which generally involves electric current values far below those which could result in damage to the penetration. We believe that changes to setpoints within the range of penetration protection are not of appropriate safety significance to require changes to the Technical Specifications. These changes would be more appropriately controlled through plant configuration control procedures.

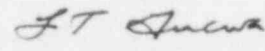
Upon removal from the Technical Specifications, any changes to the presently calculated setpoints for the subject breakers would require a plant change review and safety evaluation in accordance with the requirements of 10 CFR 50.59. This review would address the design basis, which is protection of the penetration, as well as any other relevant engineering factors. This change review process is rigidly controlled and includes the appropriate evaluation steps.

NRC has provided a Safety Evaluation (SE), dated May 28, 1985, for a change removing the subject setpoints from the Technical Specifications for Susquehanna Unit 1. This SE states: "...the staff finds that the information which has been deleted ... was an unnecessary restriction which did not significantly increase safe operation, and therefore this change is acceptable." This supports our conclusion.

Included as Attachment 1 is a 10 CFR 50.92 evaluation for the proposed change which should replace that provided in our letter of May 9, 1985.

Please contact this office if further information is desired.

Very truly yours,


L. T. Gucwa

REB/

Enclosure

xc: Mr. J. T. Beckham, Jr.
Mr. H. C. Nix, Jr.
Dr. J. N. Grace
Senior Resident Inspector, Plant Hatch

ATTACHMENT 1

NRC DOCKET 50-366
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EDWIN I. HATCH NUCLEAR PLANT UNIT 2
PROPOSED CHANGES TO TECHNICAL SPECIFICATION TABLE 3.8.2.6-1
10 CFR 50.92 EVALUATION

Proposed Change 1

Remove TRIP SETPOINT and RESPONSE TIME information from Table 3.8.2.6-1.

Basis

This information represents an unnecessary level of detail in the Technical Specifications and requires frequent revision. The listed TRIP SETPOINTS are based on protection of electrical equipment, which is not the intended safety consideration. The safety basis for the subject Technical Specification is protection of containment penetrations (and, therefore, CONTAINMENT INTEGRITY) from electrical faults.

The information which is to be deleted from the Technical Specifications is of a level of detail which should more appropriately be controlled through the plant change review process and 10 CFR 50.59 review. This review would include consideration of protection of the containment penetration against fault currents.

Implementation of this change will not involve a significant increase in the probability or consequences of an accident previously evaluated or create the possibility of a new or different kind of accident from any accident previously evaluated. No changes to the degree or type of breaker testing will result. The proposed change would allow setpoint changes to be controlled through the change review process under 10 CFR 50.59. The design basis for this requirement is provided in section 3.8.2 of the Hatch Unit 2 FSAR, which is in agreement with the position of Regulatory Guide 1.63, October 1973, which endorses the requirements of IEEE Standard 317-1971, with some additions. The basis, as defined in these documents, deals solely with protection of the containment penetration against damage due to overcurrent. Since any future setpoint changes would be rigidly controlled and reviewed against this basis under 10 CFR 50.59, reductions in the margin of safety would not result.

ATTACHMENT 1 (CONTINUED)

NRC DOCKET 50-366
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EDWIN I. HATCH NUCLEAR PLANT UNIT 2
PROPOSED CHANGES TO TECHNICAL SPECIFICATION TABLE 3.8.2.6-1
10 CFR 50.92 EVALUATION

Proposed Change 2

Delete words requiring molded case circuit breaker testing "at the specified setpoint." Reference NEMA AB2-1980 for surveillance of molded case circuit breakers.

Basis

The existing Technical Specification words requiring injection of a current input "at the specified setpoint" do not reflect the actual, nor the proper, testing method. Correct testing of circuit breakers requires injection of a current greater than "the specified setpoint." NEMA AB2-1980 addresses appropriate testing requirements for these devices and is added as a reference. Furthermore, removal of the setpoints from the table requires removal of the reference to "the specified setpoint," since it will no longer be specified in the Technical Specifications.

The proposed change does not result in any changes to the degree or type of breaker testing or any other changes to plant operation. It essentially provides correction of an erroneous testing specification. This change is also required for consistency with Proposed Change 1 described above. For these reasons, this is an administrative change and 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 April 6, 1983 issue of the Federal Register.