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Georgia Power
the southern electric system

R. H. Pinson
Vice President
Engineering and Construction Services

NED-85-655
2103N

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
EMERGENCY TECHNICAL SPECIFICATION CHANGE
RCIC INSTRUMENTATION

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 a change to the Technical Specifications, Appendix A to Operating License NPF-5. This change is requested on an emergency basis.

It has been discovered that a literal interpretation of an erroneous footnote in Table 3.3.4-2 results in a declaration of inoperability for the Reactor Core Isolation Cooling (RCIC) system and entry into a 14 day Limiting Condition for Operation in accordance with Technical Specification 3.7.3.a. The requested change will change a footnote for the subject table to correct the present error.

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

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

Attachment 3 details the basis for our determination that the proposed change does not involve significant hazards considerations. Pursuant to 10 CFR 50.91 (a)(5), we request that this amendment, which involves no significant hazards consideration, be issued without prior notice or a public comment period. Failure to provide the requested change will result in a unit shutdown. This application is being made in a timely fashion, on the day of discovery of the erroneous footnote.

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

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The proposed changed Technical Specification page follows Attachment 4.

Payment of filing fee will follow.

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.

R. H. Pinson 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: R. H. Pinson
R. H. Pinson

Sworn to and subscribed before me this 30th day of August, 1985.

Patricia H. Britt
Notary Public

Notary Public, Georgia, State at Large
My Commission Expires Mar. 2, 1987

REB/

Enclosures

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

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ATTACHMENT 1
TO GPC LETTER NED 85-655
BASIS FOR PROPOSED CHANGE

The proposed change revises the footnote on page 3/4 3-35 which explains the Condensate Storage Tank (CST) level of which the RCIC suction automatically transfers from the CST to the suppression pool. The safety design basis for the transfer logic requires that the transfer take place at a level corresponding to 10,000 gallons of water remaining in the CST, to ensure an uninterrupted supply of water to the RCIC pump. The CST level at which there are 10,000 gallons of water remaining is 130'-10 1/2" above mean sea level. The level switch which provides the signal to the transfer logic is installed correctly and provides the required signal at the 10,000 gallon level. When Technical Specifications were revised to reflect the addition of the suction transfer logic, the level at which suction transfer takes place was erroneously specified as 131'-0" above mean sea level. Since the level switch can not be calibrated to actuate at the 131'-0" level, the Technical Specification requirement is not met in the strictest sense, even though the system is capable of properly performing its safety function. Non-compliance with this Technical Specification places the unit in a 14 day limiting condition for operation. The proposed change is an administrative change which merely corrects the footnote to specify the actual basis for the setpoint, which is a level corresponding to 10,000 gallons of water in the CST.

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ATTACHMENT 2

TO GPC LETTER NED 85-655
10 CFR 50.59 EVALUATION

Pursuant to 10 CFR 50.59, the Plant Review Board and the Safety Review Board have reviewed the proposed change and determined that it does not involve an unreviewed safety question.

Incorporation of the proposed change will not increase the probability or the consequences of accidents analyzed in the FSAR. The proposed change is administrative in nature. Footnote "**" to Table 3.3.4-2 erroneously refers to CST instrument zero as being at a level of 131 feet, 0 inches above mean sea level (MSL). In actuality, CST instrument level zero is equivalent to 130 feet, 10.5 inches above MSL, which differs from the Technical Specification footnote by 1.5 inches. However, the CST inventory corresponding to the actual switchover has been analyzed and provides appropriate margins (i.e., greater than 10,000 gallons in CST). Therefore, the proposed change to the Technical Specifications, to reflect the CST inventory rather than level, is essentially administrative. Plant operation is not affected. No new types of accidents are created since no changes to plant operation are involved. The margin of safety as defined in the basis for the Technical Specification is not reduced. This margin reflects actual design values which are correct and not affected. The proposed change merely corrects an erroneous Technical Specification reference to correctly reflect the actual safety design basis for the system.

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ATTACHMENT 3

TO GPC LETTER NED 85-655
10 CFR 50.92 EVALUATION

Proposed Change

Change footnote "**" for Table 3.3.4-2 to read "Equivalent to 10,000 gallons of water in the condensate storage tank."

Basis

The Reactor Core Isolation Cooling (RCIC) system pump takes suction from either the Condensate Storage Tank (CST) or the Torus. When the water level in the CST drops to a preset point, switchover to the torus occurs. The switchover level is based on providing an uninterrupted supply of water to the RCIC pump during the switchover process. The switchover level ($\geq$ 0 inches CST instrument level) corresponds to an inventory of 10,000 gallons in the CST. The proposed administrative change would change the footnote, which presently references an elevation above mean sea level (MSL), to instead reference the remaining inventory in gallons. It has been determined that the level above MSL provided in the footnote is in error by a very small margin. Changing the note to reflect the inventory will more accurately reflect the safety basis.

The proposed change does not result in a significant increase in the probability or consequences of analyzed accidents. The proposed change essentially corrects an error in the Technical Specifications. No changes to plant operation will result. The proposed change does not create any new types of accidents since plant operation is unaffected. The proposed change does not significantly reduce a margin of safety. The change corrects an error and provides the appropriate cross reference for the subject setpoint. Margins of safety are not affected. This change is consistent with example (i) of "Amendments that are considered not likely to involve significant hazards considerations" as described in the Federal Register, Vol. 48, No. 67, Page 14870.

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ATTACHMENT 4

TO GPC LETTER NED-85-655
INCORPORATION INSTRUCTIONS

The proposed change to Technical Specifications (Appendix A to Operating License NPF-5) would be incorporated as follows:

Remove Page	Insert Page
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