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**Vogtle Project**

March 26, 1986

Director of Nuclear Reactor Regulation  
Attention: Mr. B. J. Youngblood  
PWR Project Directorate #4  
Division of PWR Licensing A  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

File: X7BC35  
Log: GN-846

REF: GN-613, BAILEY TO DENTON, 5/20/85

NRC DOCKET NUMBERS 50-424 AND 50-425  
CONSTRUCTION PERMIT NUMBERS CPPR-108 AND CPPR-109  
VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 AND 2  
SER OPEN ITEM 5: GENERIC LETTER 83-28

Dear Mr. Denton:

In the referenced letter commitments were made to review the VEGP Technical Specifications to ensure that post maintenance testing, as required by the Technical Specifications, did not degrade safety-related components. Attached for your staff's review are the measures taken to ensure that paragraphs 3.1 and 3.2 of GL 83-28 were considered in the preparation of the Technical Specifications.

If your staff requires any additional information, please do not hesitate to contact me.

Sincerely,

J. A. Bailey  
Project Licensing Manager

JAB/sm  
Attachment

xc: R. E. Conway  
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## ATTACHMENT

### Generic Letter 33-28

- 3.1.3. Licensees and applicants shall identify, if applicable, any post-maintenance test requirements in existing Technical Specifications which can be demonstrated to degrade rather than enhance safety. Appropriate changes to these test requirements, with supporting justification, shall be submitted for staff approval. (Note that action 4.5 discusses on-line system functional testing.)

Response: The VEGP Unit 1 Draft Technical Specifications which were submitted for review on February 28, 1986 (Reference GN-821) incorporate the results of WCAP 10271, Supplement 1 "Evaluation of Surveillance Frequencies and Out of Service Times for the Reactor Protection Instrumentation System."

The impetus for this study was the effect on the plant and plant personnel that has been experienced during test and maintenance activities. Operating plants have experienced many inadvertent reactor trips during performance of surveillance, causing unnecessary transients and challenges to safety systems. Significant time and effort on the part of the operating staff must be devoted to performing, reviewing, documenting and tracking the various surveillance activities, which in many instances seems unwarranted based on the high reliability of the equipment. Significant benefits for operating plants appears to be achievable through revision of test and maintenance requirements.

WCAP 10271, Supplement 1 does not, however, address testing of the reactor trip breakers. A separate study is being conducted by Westinghouse under the direction of the Owner's Group to address this question. We plan to evaluate the results of this study for applicability to the VEGP Unit 1 Technical Specifications when the results become available.

- 3.2.3. Licensees and applicants shall identify, if applicable, any post-maintenance test requirements in existing Technical Specifications which are perceived to degrade rather than enhance safety. Appropriate changes to these test requirements, with support justification, shall be submitted for staff approval.

Response: WCAP 10271, Supplement 2 applies the same methodology to the ESFAS which was applied to the RPS. This supplement to WCAP 10271 has been submitted to the NRC for review and we are in the process of evaluating the results for applicability to the VEGP Unit 1 Technical Specifications.

In addition, we are developing a Turbine Overspeed Protection Reliability Program which will consist of a comprehensive program for turbine inspection and the maintenance, calibration, and testing of the turbine overspeed protection system. See the response to Question 430.50 for further discussion.

Finally, in our February 28, 1986 submittal of Draft Technical Specifications for VEGP Unit 1, we are proposing surveillance requirements for the emergency diesel generators which are designed to reduce the frequency of cold fast starts and fast loading and improve emergency diesel generator reliability.

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