

J. Bernie Beasley, Jr., P.E.
Vice President
Vogtle Project

**Southern Nuclear
Operating Company, Inc.**
40 Inverness Center Parkway
P.O. Box 1295
Birmingham, Alabama 35201

Tel 205.992.7110
Fax 205.992.0403



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LCV 1149-E

Docket Nos. 50-424
50-425

TAC No. MA8501
MA8502

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

Ladies and Gentlemen:

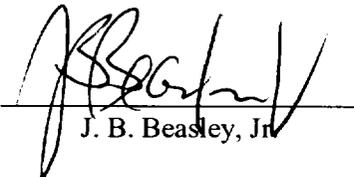
**VOGTLE ELECTRIC GENERATING PLANT
RESPONSES TO DISCUSSION TOPICS REGARDING
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
CONTAINMENT EQUIPMENT HATCH**

By letter (LCV-1149-D) dated March 6, 2000, Southern Nuclear Operating Company (SNC) proposed to revise the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications (TS) Limiting Condition for Operation (LCO) 3.9.4, Containment Penetrations, to allow the equipment hatch to be open during core alterations and/or movement of irradiated fuel assemblies within containment. In response to our proposal, a conference call was held on June 28, 2000, to clarify specific aspects of our submittal. The NRC staff provided specific discussion topics for the conference call via facsimile transmission dated June 27, 2000. At the request of the NRC staff, our responses to the discussion topics are provided in the enclosure. For clarity, the discussion topics are repeated, followed by the SNC response.

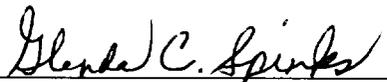
Mr. J. B. Beasley, Jr. states that he is a Vice President of Southern Nuclear Operating Company and is authorized to execute this oath on behalf of Southern Nuclear Operating Company and that, to the best of his knowledge and belief, the facts set forth in this letter are true.

A 001

SOUTHERN NUCLEAR OPERATING COMPANY

By: 
J. B. Beasley, Jr.

Sworn to and subscribed before me this 6th day of July, 2000.


Notary Public

My commission expires: 11/10/02

JBB/NJS

Enclosure: Responses to Discussion Topics

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser
Mr. M. Sheibani
SNC Document Management

U. S. Nuclear Regulatory Commission
Mr. L. A. Reyes, Regional Administrator
Mr. R. R. Assa, Project Manager, NRR
Mr. John Zeiler, Senior Resident Inspector, Vogtle

Enclosure

Vogtle Electric Generating Plant Responses To Discussion Topics Regarding Request To Revise Technical Specifications Containment Equipment Hatch

1. In event of the need to close equipment hatch, what do procedures call for?

a. Will equipment hatch opening be fully closed?

SNC Response: Yes. The hatch will be fully closed and held in place by four bolts.

b. How long will it take for the equipment hatch door to effectively block opening?

SNC Response: In general, it will take approximately 10 minutes to mobilize the closure crew and approximately another 20 minutes to clear any obstructions, lower the hatch into place and install four bolts. As documented in our submittal LCV-1149-D, for the purpose of estimating dose to the closure crew, we estimated a total time of approximately one hour. This would allow time for the closure crew to exit containment via the personnel air lock.

c. How long will it take to complete required bolting of hatch?

SNC Response: See the answer to item 1.b. above.

d. Where will equipment hatch be located while containment is open?

SNC Response: By design, the equipment hatch hangs directly above the opening.

e. What equipment, electrical power, etc. is needed to close hatch?

SNC Response: The hatch is lowered into place via a winch. Normally an electrical powered winch is used, but in the event of a loss of electrical power, an air-powered winch is also provided. Nitrogen bottles are staged at the hatch at the beginning of an outage to drive the air-powered winch if needed.

f. What other duties will the hatch closing crew have during fuel handling?

SNC Response: A hatch closing crew will be designated for each shift during which core alterations and/or movement of irradiated fuel (with the equipment hatch open) will take place. Responsible shift supervision will know who the members of the closure crew are. While the crew will have normal outage related duties, these duties will not interfere with their availability to respond to the closure of the hatch. A means of communication will be established so that the closure crew can be promptly notified of the need to close the hatch.

2. Will the actual equipment hatch be the only means of closing the containment hatch opening? Are there situations that will call for a different means of closing? Is there a back-up means of closing containment if the primary method fails?

SNC Response: The equipment hatch is the only means of closing the opening, and there are no current plans for any different means of closing the opening. In the event of a loss of electrical power

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to the winch that is used to lower the hatch into place, an air-powered winch has been provided as discussed above.

3. Has the purge exhaust system been operated with the equipment hatch open in the past, and what is the experience with this?

SNC Response: The purge exhaust system has been operated with the hatch open in the past, and system performance was acceptable.

4. Could the statement from page E1-4, paragraph 3, be more clearly discussed: “The equipment hatch will be capable of being cleared of obstructions so that closure can be achieved as soon as possible...”? Of specific interest are the phrases “capable of being cleared of obstruction” and “as soon as possible.”

Is there a need for allowing obstructions to the equipment hatch opening during movement of fuel and core alterations? Are considerations being made to limit the need for obstructions during this period?

What types of obstructions to the equipment hatch are anticipated? Will heavy equipment be required to move anticipated obstructions?

SNC Response: Allowing the equipment hatch to be open during core alterations and/or movement of irradiated fuel assemblies within containment will facilitate movement of equipment and supplies into and out of containment during core offload and reload. The actual movement of the equipment and supplies will be accomplished by carts or Hillman® rollers (depending on the size of the load to be moved through the opening). Any obstructions of this nature can be moved out of the way to facilitate hatch closure within the timeframe discussed in the response to item 1.b above. In addition, the movement of carts, etc., through the opening is accomplished via a ramp/drawbridge assembly that must be raised to close the hatch. Unit 2 has been equipped with a redesigned ramp/drawbridge assembly that can be more easily moved without the use of heavy equipment. Unit 1 will be equipped with a similar ramp/drawbridge assembly during the next refueling outage. It is not our practice to feed power cables or hoses through the equipment hatch opening. Special containment penetrations are provided for this purpose. However, in the unusual event that it becomes necessary to feed cables or hoses through the opening, administrative controls will be utilized to ensure that they can be quickly disconnected or otherwise removed from the opening.

5. What manner of training will the hatch closing crew receive? Who will direct closing the hatch, and what manner of training will he or she receive?

SNC Response: Personnel responsible for closing the containment equipment hatch already receive rigorous formalized training in support of reduced inventory operation prior to each refueling outage. The direction for closing the hatch will come from control room supervision, who receive appropriate training in support of reduced inventory operation during licensed operator requalification training. It is our intent to utilize this same training in support of core alterations and/or movement of fuel with the equipment hatch open.

6. What steps have been taken to ensure compliance with General Design Criteria 64 (Monitoring Radioactivity Releases)?

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Vogtle Electric Generating Plant Responses To Discussion Topics Regarding Request To Revise Technical Specifications Containment Equipment Hatch

SNC Response: As stated in our submittal, the containment purge exhaust is equipped with radiation detectors, which monitor particulate, iodine and noble gases. Our capability to operate the purge exhaust system in response to a fuel handling accident inside containment will draw air into containment and then exhaust that air through the purge exhaust filters and past the radiation detectors. As stated in our submittal, the operation of the purge exhaust system will have to be coordinated with the placement and initial bolting of the hatch. This is consistent with the most recent guidance provided in NUMARC 93-01, section 11.3.6.5 which states that the goal of maintaining ventilation system and radiation monitor availability is to reduce doses even further below that provided by natural decay, and to avoid unmonitored releases. Therefore, SNC maintains that the installed purge exhaust system radiation detectors and the capability to operate the purge exhaust system in the event of a fuel handling accident inside containment meets the intent of General Design Criterion 64. If for any reason operation of the purge exhaust system must be discontinued during core alterations/fuel movement with the hatch open, the opening will be monitored for radioactive releases via the health physics air monitoring station.