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SOUTHERN COMPANY
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Docket Nos. 50-321
50-366

HL-6103

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

Edwin I. Hatch Nuclear Plant
Third 10-Year Interval Inservice Testing (IST) Program,
Submittal of Relief Request RR-V-17

Ladies and Gentlemen:

Southern Nuclear Operating Company (SNC) submitted the Third 10-Year Interval Inservice Testing (IST) Program for Edwin I. Hatch Nuclear Plant to the NRC for review on September 15, 1995. The subject IST Program was developed to comply with the requirements of the ASME OM Code 1990 Edition for all components except safety and relief valves. The ASME OM Code 1995 Edition with OMa-1996 Addenda was applied for IST of safety and relief valves. The NRC issued the initial Safety Evaluation Report on April 12, 1996. Since that time, SNC has provided additional information, responses to various NRC open items, and has submitted additional requests for relief as deemed necessary and appropriate.

During recent review of planned maintenance activities at Plant Hatch, SNC personnel identified an ASME OM Code requirement, related to check valves, which results in unwarranted restrictions on the scheduling and performance of certain IST. After review and evaluation of the OM Code requirement, and communications with ASME OM Code Committee members, SNC decided to submit an additional relief request for NRC review. Relief Request RR-V-17 is enclosed for NRC review and disposition. SNC hopes to be able to plan and schedule the alternative provided in RR-V-17 in the very near future. Therefore, prompt review of the enclosed relief request is requested and NRC response by October 1, 2001 would be appreciated.

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

Respectfully submitted,

Lewis Sumner

H. L. Sumner, Jr.

IFL/eb

Attachment: IST Relief Request RR-V-17

cc: (See next page.)

A047

cc: Southern Nuclear Operating Company
Mr. P. H. Wells, Nuclear Plant General Manager
SNC Document Management (R-Type A02.001)

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. L. N. Olshan, Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II
Mr. L. A. Reyes, Regional Administrator
Mr. J. T. Munday, Senior Resident Inspector - Hatch

VALVE RELIEF REQUEST
RR-V-17

SYSTEM(S): Residual Heat Removal (RHR - E11)
Jockey Pump (JP - E21)
High Pressure Coolant Injection System (E41)
Reactor Core Isolation Cooling (RCIC - E51)
Plant Service Water (PSW - P41)

COMPONENTS: Unit 1

GROUP	MPL	ASME CLASS	SIZE	RR/ROJ/Note*
1E11-1	1E11-F046A	2	3"	ROJ-V-12
	1E11-F046B	2	3"	ROJ-V-12
	1E11-F046C	2	3"	ROJ-V-12
	1E11-F046D	2	3"	ROJ-V-12
1E11-2	1E11-F125A	2	2"	RR-V-12
	1E11-F125B	2	2"	RR-V-12
1E21-1	1E21-F036A	2	3"	ROJ-V-28
	1E21-F036B	2	3"	ROJ-V-28
1E21-2	1E21-F039A	2	1½"	RR-V-12
	1E21-F039B	2	1½"	RR-V-12
1E41-1	1E41-F022	2	2"	ROJ-V-16
1E41-2	1E41-F040	2	2"	ROJ-V-17
1E41-3	1E41-F045	2	16"	RR-V-7
1E41-4	1E41-F046	2	4"	ROJ-V-18
1E41-5	1E41-F048	2	2"	Note 9
1E41-6	1E41-F057	2	2"	Note 9
1E51-1	1E51-F021	2	2"	ROJ-V-22
1P41-5	1P41-F1074	3	4"	RR-V-14
	1P41-F1075	3	4"	RR-V-14

COMPONENTS: Unit 2

GROUP	MPL	ASME CLASS	SIZE	RR/ROJ/Note*
2E11-1	2E11-F046A	2	3"	ROJ-V-12
	2E11-F046B	2	3"	ROJ-V-12
	2E11-F046C	2	3"	ROJ-V-12
	2E11-F046D	2	3"	ROJ-V-12
2E11-2	2E11-F123A	2	2"	RR-V-12
	2E11-F123B	2	2"	RR-V-12
2E21-2	2E21-F036A	2	3"	ROJ-V-28
	2E21-F036B	2	3"	ROJ-V-28
2E21-3	2E21-F039A	2	1½"	RR-V-12
	2E21-F039B	2	1½"	RR-V-12
2E41-1	2E41-F022	2	2"	ROJ-V-16
2E41-2	2E41-F040	2	2"	ROJ-V-17
2E41-3	2E41-F045	2	16"	RR-V-7
2E41-4	2E41-F046	2	4"	ROJ-V-18
2E41-5	2E41-F048	2	2"	Note 9
2E41-6	2E41-F057	2	2"	Note 9
2E51-1	2E51-F021	2	2"	ROJ-V-22
2P41-3	2P41-F098	3	4"	Note 9
2P41-5	2P41-F105	3	3"	Note 9

* Denotes reference to additional information contained in IST Program related to the use of disassembly, inspection, and manual exercising as an alternative to quarterly exercising with flow.

CATEGORY: C

ASME CLASS: 2 and 3

TEST REQUIREMENT:

ASME OM Code, 1990 Edition, paragraph ISTC 4.5.4(c) allows disassembly every refueling outage to verify operability of check valves as an alternative to the exercising requirements of paragraphs ISTC 4.5.4(a) and (b).

REQUIREMENT FOR WHICH RELIEF IS REQUESTED:

Relief is requested from the Code requirement that check valve disassembly be performed only during a refueling outage.

BASIS FOR RELIEF:

NRC Generic Letter (GL) 89-04, Position 2, provides guidance for the grouping of check valves and sample disassembly as an alternative to the OM Code, subsection ISTC requirements. GL 89-04, Position 2, paragraph 2.b states: ".....Since this frequency differs from the Code required frequency, this deviation must be specifically noted in the IST program". Additionally, paragraph 2.d states: "Where the licensee determines that it is burdensome to disassemble and inspect all applicable valves each refueling outage, a sample disassembly and inspection plan for groups of identical valves in similar applications may be employed." All of the above listed check valves are specifically identified in the existing Hatch IST program for application of the guidelines of GL 89-04, Position 2. These check valves are grouped per the GL with a maximum of four valves and a minimum of one valve per group. At least one check valve from each group is disassembled, visually inspected, and manually full-stroke exercised each refueling outage. Therefore, the regulatory guidance and the OM Code requirements, associated with check valve disassembly, are incorporated into the existing Hatch IST program.

The Code of Federal Regulations, Title 10, Part 50, paragraph 65(a)(4) (i.e., 10CFR50.65(a)(4)) requires Licensees to assess and manage the increase of risk that may result from proposed maintenance activities. SNC complies with the 10CFR50.65(a)(4) requirements at Plant Hatch via the application of a safety related procedure governing maintenance scheduling. This procedure dictates the requirements for risk evaluations as well as the necessary levels of action required for risk management in each case. The procedure also controls operation of the on-line risk monitor system which is based on the Hatch Probabilistic Risk Assessment (PRA). In addition, this procedure provides methods for risk assessing maintenance activities for components not directly in the Hatch Probabilistic Safety Assessment (PSA) model. With the use of risk evaluation for virtually all aspects of nuclear plant operation, SNC has initiated efforts to accomplish additional maintenance, surveillance, and testing activities during normal operation. Planned activities are evaluated utilizing risk insights to determine the impact on safe operation of the plant and the ability to maintain associated safety margins. Individual system components, a system train, or a complete system may be planned to be out-of-service to allow maintenance, or other activities, during normal operation. The use of risk assessment to plan and schedule check valve disassembly during normal operation will provide an acceptable level of quality and safety and is thus authorized by 10CFR50.55a(3)(i).

All of the above listed check valves are located within systems that could be scheduled for maintenance during normal operation, thus allowing for their disassembly, examination, and full-stroke exercising. All activities are performed in accordance with plant procedures which meet 10CFR50.65(a)(4) requirements and provide detailed instructions for disassembly, inspection, exercising, and considerations for corrective actions, and potential regulatory required scope expansion are factored into the planning process.

ALTERNATE TESTING:

Check valve disassembly, inspection, and manual exercising will continue to be performed utilizing the guidance contained in NRC GL 89-04, Position 2. Such disassembly, inspection, and manual exercising will be performed during normal plant operation or during refueling outages as appropriate. Any check valve disassembly performed during normal plant operation will be managed in accordance with the requirements of 10CFR50.65(a)(4).