

August 9, 1991

Docket Nos. 50-424  
and 50-425

Distribution  
See next page

Mr. W. G. Hairston, III  
Senior Vice President -  
Nuclear Operations  
Georgia Power Company  
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Birmingham, Alabama 35201

Dear Mr. Hairston:

SUBJECT: ISSUANCE OF AMENDMENT NO. 41 TO FACILITY OPERATING LICENSE NPF-68  
AND AMENDMENT NO. 21 TO FACILITY OPERATING LICENSE NPF-81 - VOGTLE  
ELECTRIC GENERATING PLANT, UNITS 1 AND 2 (TACS 80088/80089)

The Nuclear Regulatory Commission has issued the enclosed Amendment No.41 to Facility Operating License No. NPF-68 and Amendment No. 21 to Facility Operating License No. NPF-81 for the Vogtle Electric Generating Plant, Units 1 and 2. These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated March 29, 1991.

The amendments revise the Technical Specification (TS) surveillance requirements regarding visual inspection of snubbers.

A copy of the related Safety Evaluation is also enclosed. Notice of issuance of the amendments will be included in the Commission's biweekly Federal Register notice.

Sincerely,

ORIGINAL SIGNED BY:

Darl Hood, Project Manager  
Project Directorate II-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 41 to NPF-68
- 2. Amendment No. 21 to NPF-81
- 3. Safety Evaluation

cc w/enclosures:  
See next page

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NAME D. Matthews  
DATE 8/8/91

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Vogle Electric Generating Plant

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DATED:           AUGUST 9, 1991          

AMENDMENT NO.41 TO FACILITY OPERATING LICENSE NPF-68 - Vogtle Electric  
Generating Plant, Unit 1

AMENDMENT NO.21 TO FACILITY OPERATING LICENSE NPF-81 - Vogtle Electric  
Generating Plant, Unit 2

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

GEORGIA POWER COMPANY

OGLETHORPE POWER CORPORATION

MUNICIPAL ELECTRIC AUTHORITY OF GEORGIA

CITY OF DALTON, GEORGIA

DOCKET NO. 50-424

VOGTLE ELECTRIC GENERATING PLANT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 41  
License No. NPF-68

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment to the Vogtle Electric Generating Plant, Unit 1 (the facility) Facility Operating License No. NPF-68 filed by the Georgia Power Company, acting for itself, Oglethorpe Power Corporation, Municipal Electric Authority of Georgia, and City of Dalton, Georgia (the licensees) dated March 29, 1991, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
  - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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2. Accordingly, the license is hereby amended by page changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. NPF-68 is hereby amended to read as follows:

Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 41, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into this license. GPC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



David B. Matthews, Director  
Project Directorate II-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Technical Specification Changes

Date of Issuance: August 9, 1991



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

GEORGIA POWER COMPANY

OGLETHORPE POWER CORPORATION

MUNICIPAL ELECTRIC AUTHORITY OF GEORGIA

CITY OF DALTON, GEORGIA

DOCKET NO. 50-425

VOGTLE ELECTRIC GENERATING PLANT, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 21  
License No. NPF-81

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment to the Vogtle Electric Generating Plant, Unit 2 (the facility) Facility Operating License No. NPF-81 filed by the Georgia Power Company, acting for itself, Oglethorpe Power Corporation, Municipal Electric Authority of Georgia, and City of Dalton, Georgia (the licensees) dated March 29, 1991, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
  - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is hereby amended by page changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. NPF-81 is hereby amended to read as follows:

Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 21, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into this license. GPC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



David B. Matthews, Director  
Project Directorate II-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Technical Specification Changes

Date of Issuance: August 9, 1991

ATTACHMENT TO LICENSE AMENDMENT NO. 41  
FACILITY OPERATING LICENSE NO. NPF-68  
AND LICENSE AMENDMENT NO. 21  
FACILITY OPERATING LICENSE NO. NPF-81  
DOCKET NOS. 50-424 AND 50-425

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain vertical lines indicating the areas of change. The corresponding overleaf pages are also provided to maintain document completeness.

<u>Remove Pages</u>	<u>Insert Pages</u>
ix *	ix *
x	x
3/4 7-19	3/4 7-19
3/4 7-20	3/4 7-20
--	3/4 7-24a
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## PLANT SYSTEMS

### 3/4.7.8 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

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3.7.8 All snubbers shall be OPERABLE. The only snubbers excluded from the requirements are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety-related system.

APPLICABILITY: MODES 1, 2, 3, and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES.

#### ACTION:

With one or more snubbers inoperable on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.8g. on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

#### SURVEILLANCE REQUIREMENTS

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4.7.8 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program in addition to the requirements of Specification 4.0.5.

a. Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these groups (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7-2. The visual inspection interval for each category of snubber shall be determined based upon the criteria provided in Table 4.7-2 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before Amendment 41 and 21 for Vogtle Units 1 and 2, respectively.

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

#### c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that: (1) there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are functional. Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, provided that: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers, irrespective of type, that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.8f. All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable and may be reclassified as acceptable for determining the next inspection interval provided that criteria (1) and (2) above are met. A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met.

#### d. Transient Event Inspection

An inspection shall be performed of all snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems within 6 months following such an event. In addition to satisfying the visual inspection acceptance criteria, freedom-of-motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement; or (2) evaluation of in-place snubber piston setting; or (3) stroking the mechanical snubber through its full range of travel.

#### e. Functional Tests

During the first refueling shutdown and at least once per 18 months thereafter during shutdown, a representative sample of snubbers of each type shall be tested using one of the following sample plans. The sample plan for each type shall be selected prior to the test period and cannot be changed during the test period. The NRC Regional Administrator shall be notified in writing of the sample plan selected for each snubber type prior to the test period or the sample plan used in the prior test period shall be implemented:

- 1) At least 10% of the total of each type of snubber shall be functionally tested either in-place or in a bench test. For each snubber of a type that does not meet the functional test acceptance criteria of Specification 4.7.8f., an additional 10% of that type of snubber shall be functionally tested until no more failures are found or until all snubbers of that type have been functionally tested; or

TABLE 4.7-2

SNUBBER VISUAL INSPECTION INTERVAL

Population or Category (Notes 1 and 2)	NUMBER OF UNACCEPTABLE SNUBBERS		
	Column A Extend Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or greater	29	56	109

Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, the licensee must make and document that decision before any inspection and shall use that decision as the basis upon which to determine the next inspection interval for that category.

Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. Use next lower integer for the value of the limit for Columns A, B, or C if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.

Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.

Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.

TABLE 4.7-2 (Continued)

SNUBBER VISUAL INSPECTION INTERVAL

Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in Column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous intervals and the number in Column B to the difference in the numbers in Columns B and C.

Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

## PLANT SYSTEMS

### BASES

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#### SNUBBERS (Continued)

Nuclear Regulatory Commission (NRC) Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," dated December 11, 1990, provides an alternate method for determining the next interval for the visual inspection of snubbers from that to which the plant was originally licensed. The original schedule for snubber visual inspection was based only on the number of inoperable snubbers found during the previous visual inspection, irrespective of the size of the snubber population. As a result, plants having a large number of snubbers found the original inspection schedule to be excessively restrictive. Significant resources, including subjecting plant personnel to unnecessary radiological exposure, were expended in order to comply with the visual inspection requirements. The alternate schedule provided by NRC Generic Letter 90-09 maintains the same confidence level as that to which the plant was originally licensed and generally allows for the performance of visual inspections and any corrective actions during plant outages. Incorporated herein as Table 4.7-2, "Snubber Visual Inspection Interval," the alternate inspection schedule is based upon the number of unacceptable snubbers found during the previous inspection in proportion to the size of various snubber populations or categories. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. The categories may be inspected separately or jointly. However, categorization and inspection thereof must be made and documented prior to any inspection and that decision will constitute the basis for determining the next inspection interval for that category. A snubber is considered unacceptable if it fails to satisfy the acceptance criteria for the visual inspection. If review and evaluation shall be declared inoperable and the applicable ACTION requirements shall be met. To determine the next inspection interval, the unacceptable snubber may be reclassified as acceptable if it can be demonstrated that the snubber is operable in its as-found condition by the performance of a functional test and if it satisfies the acceptance criteria for functional testing. The next inspection interval may be twice, the same, or reduced to as much as two-thirds of the previous inspection interval and is contingent upon the number of unacceptable snubbers found in proportion to the population or category for each type of snubber included in the previous inspection. While the original inspection schedule requirements established inspection intervals of 18 months (the length of a nominal fuel cycle) or a fraction thereof based on the number of inoperable snubbers of each type for the previous inspection period, the alternate method allows inspection intervals to be compatible with a 24-month fuel cycle. The interval may be increased to every other refueling outage for plants on a 24-month fuel cycle or up to 48 months for plants with other fuel cycles if few unacceptable snubbers are found from the previous inspection. Table 4.7-2 establishes limits for determining the next inspection interval and is consistent with the guidance provided in NRC Generic Letter 90-09.

## PLANT SYSTEMS

### BASES

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#### SNUBBERS (Continued)

The acceptance criteria are to be used in the visual inspection to determine OPERABILITY of the snubbers. For example, if a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be counted as unacceptable and may be reclassified as acceptable for determining the next visual inspection interval provided that certain criteria in Specification 4.7.8c are met. A review and evaluation shall be performed and documented to justify continued operation with the unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met.

To provide assurance of snubber functional reliability, one of three functional testing methods is used with the stated acceptance criteria:

1. Functionally test 10% of a type of snubber with an additional 10% tested for each functional testing failure, or
2. Functionally test a sample size and determine sample acceptance or rejection using Figure 4.7-1, or
3. Functionally test a representative sample size and determine sample acceptance or rejection using the stated equation.

Figure 4.7-1 was developed using "Wald's Sequential Probability Ratio Plan" as described in "Quality Control and Industrial Statistics" by Acheson J. Duncan.

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented and, if applicable, snubber life destructive testing was performed to qualify the snubbers for the applicable design conditions at either the completion of their fabrication or at a subsequent date. Snubbers so exempted shall be listed in the list of individual snubbers indicating the extent of the exemptions.



## PLANT SYSTEMS

### BASES

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#### SNUBBERS (Continued)

The service life of a snubber is established via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubbers, seal replaced, spring replaced, in high radiation area, in high temperature area, etc.). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life.

#### 3/4.7.9 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(a)(3) limits for plutonium. This limitation will ensure that leakage from Byproduct, Source, and Special Nuclear Material sources will not exceed allowable intake values.

Sealed sources are classified into three groups according to their use, with Surveillance Requirements commensurate with the probability of damage to a source in that group. Those sources which are frequently handled are required to be tested more often than those which are not. Sealed sources which are continuously enclosed within a shielded mechanism (i.e., sealed sources within radiation monitoring or boron measuring devices) are considered to be stored and need not be tested unless they are removed from the shielded mechanism.

#### 3/4.7.10 AREA TEMPERATURE MONITORING

The area temperature limitations specified in Table 3.7-3 ensure that safety-related equipment not serviced by ESF HVAC systems and necessary for safe shut-down will not be subjected to temperatures in excess of their environmental qualification temperatures. Exposure to excessive temperatures may degrade equipment and can cause a loss of its OPERABILITY.

#### 3/4.7.11 ENGINEERED SAFETY FEATURES (ESF) ROOM COOLER AND SAFETY-RELATED CHILLER SYSTEM

The operation of the ESF Room Cooler and Safety-Related Chiller System ensures that the ambient air temperature does not exceed the allowable temperature for continuous duty rating for the equipment cooled by the system.

#### 3/4.7.12 REACTOR COOLANT PUMP THERMAL BARRIER COOLING WATER ISOLATION

This isolation function is designed to prevent a spill of the reactor coolant from a postulated breached thermal barrier should a break occur in the nonsafety-related ACCW piping downstream of the isolation valve.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 41 TO FACILITY OPERATING LICENSE NPF-68  
AND AMENDMENT NO. 21 TO FACILITY OPERATING LICENSE NPF-81

GEORGIA POWER COMPANY, ET AL.

VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2

DOCKET NOS. 50-424 AND 50-425

1.0 INTRODUCTION

By letter dated March 29, 1991, Georgia Power Company (the licensee) submitted a request for changes to the Vogtle Electric Generating Plant, Units 1 and 2, Technical Specifications (TSs). The requested changes would revise the visual inspection requirements for snubbers in TS 4.7.8 in response to the guidance provided in the NRC's Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Action."

2.0 EVALUATION

The present snubber visual examination schedule in the TSs is based on the number of inoperable snubbers identified in the previous visual examination. The schedule is determined only by the absolute number of the inoperable snubbers discovered during the previous visual examination and does not depend on the size of the snubber population. Therefore, licensees with a large snubber population find the schedule excessively restrictive.

Generic Letter 90-09 provides an acceptable alternative visual examination schedule permitting licensees to perform visual examinations and corrective actions during refueling outages without decreasing the confidence level provided by the existing surveillance requirements. The basic examination interval is the normal fuel cycle up to 24 months. This interval may be extended to as long as twice the fuel cycle or reduced to as small as two-thirds of the fuel cycle depending on the number of unacceptable snubbers found during the visual examination. The examination interval may vary by  $\pm 25$  percent to coincide with the actual outage.

If one or more snubbers are found inoperable during a visual examination, the Limiting Conditions for Operation (LCO) in the present TSs require the licensee to restore or replace the inoperable snubber(s) to operable status within 72 hours, or declare the attached system inoperable and follow the appropriate action statement for that system. This LCO will remain in the TSs. However, the permissible number of inoperable snubber(s) and the subsequent visual examination interval will now be determined in accordance with the new visual examination schedule (proposed TS Table 4.7-2). As noted in the guidance of Generic Letter 90-09 for this line item TS improvement, certain corrective actions may have to be performed depending on the number of

inoperable snubbers found. All requirements for corrective actions and evaluations associated with the use of the visual examination schedule and those stated in Footnotes 1 through 6 (Table 1 of Generic Letter 90-09) are proposed to be included in the TSSs.

The NRC staff has reviewed the proposed amendments, and finds the licensee's proposed changes to TS 3/4.7.8 to be consistent with the guidance provided in Generic Letter 90-09 for the replacement of the snubber visual examination schedule with Table 1 (including Footnotes 1 through 6) of Generic Letter 90-09 with three minor exceptions. These minor exceptions are: 1) The term "category of snubbers" is substituted for "type of snubber" in TS 4.7.8b, 2) The term "other snubbers" in TS 4.7.8c, criteria 1 concerning reclassification of snubbers with regard to acceptability is clarified to indicate that any type of snubber is meant, and 3) The requirement concerning hydraulic snubbers found connected to an inoperable common hydraulic fluid reservoir is supplemented to indicate that the snubber shall be counted as unacceptable and may be reclassified as acceptable for determining the next visual inspection interval provided that certain criteria which currently exist in TS 4.7.8c are met. The staff finds these minor changes to be of an editorial or clarification nature and to be consistent with the intent of the NRC Generic Letter 90-09. Accordingly, and on the basis of acceptable conformance to Generic Letter 90-09, we find the proposed changes to the TSSs for Vogtle Units 1 and 2 to be acceptable.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Georgia State official was notified of the proposed issuance of the amendments. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendments change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and in the types, of any effluents that may be released offsite, and that there is no impact to the individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (56 FR 20040). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

### 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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