

July 31, 1990

Docket Nos. 50-424  
and 50-425

Mr. W. G. Hairston, III  
Senior Vice President -  
Nuclear Operations  
Georgia Power Company  
P.O. Box 1295  
Birmingham, Alabama 35201

Dear Mr. Hairston:

SUBJECT: ISSUANCE OF AMENDMENT NO.33 TO FACILITY OPERATING LICENSE NPF-68  
AND AMENDMENT NO. 13 TO FACILITY OPERATING LICENSE NPF-81 - VOGTLE  
ELECTRIC GENERATING PLANT, UNITS 1 AND 2 (TACs 75903/75904)

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 33 to Facility Operating License No. NPF-68 and Amendment No. 13 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 letter dated January 15, 1990.

The amendments revise TS 4.0.2 by deleting the requirement that the combined time interval for any three consecutive surveillance intervals not exceed 3.25 times the specified surveillance interval. The changes are consistent with the guidance of Generic Letter 89-14, "Line-Item Improvements in Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals."

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

Sincerely,

Original signed by:

Timothy A. Reed, Project Manager  
Project Directorate II-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 33 to NPF-68
- 2. Amendment No. 13 to NPF-81
- 3. Safety Evaluation

cc w/enclosures: See next page

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Vogtle Electric Generating Plant

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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  
VOGTLE ELECTRIC GENERATING PLANT, UNIT 1  
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 33  
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 January 15, 1990, 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-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. 33, 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  
Office of Nuclear Reactor Regulation

Attachment:  
Technical Specification Changes

Date of Issuance: July 31, 1990



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

GEORGIA POWER COMPANY  
OGLETHORPE POWER CORPORATION  
MUNICIPAL ELECTRIC AUTHORITY OF GEORGIA  
CITY OF DALTON, GEORGIA  
VOGTLE ELECTRIC GENERATING PLANT, UNIT 2  
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 13  
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 January 15, 1990, 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. 13, 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  
Office of Nuclear Reactor Regulation

Attachment:  
Technical Specification Changes

Date of Issuance: July 31, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 33

FACILITY OPERATING LICENSE NO. NPF-68

AND LICENSE AMENDMENT NO. 13

FACILITY OPERATING LICENSE NO. NPF-81

DOCKETS 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.

Amended Page

3/4 0-2  
B 3/4 0-2

Overleaf Page

3/4 0-1  
B 3/4 0-1a

## 3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS\*

### 3/4.0 APPLICABILITY

#### LIMITING CONDITION FOR OPERATION

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3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required during the OPERATIONAL MODES or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.

3.0.2 Noncompliance with a specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required.

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within 1 hour action shall be initiated to place the unit in a MODE in which the specification does not apply by placing it, as applicable, in:

- a. At least HOT STANDBY within the next 6 hours,
- b. At least HOT SHUTDOWN within the following 6 hours, and
- c. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the action may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual specifications.

This specification is not applicable in MODE 5 or 6.

3.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the conditions for the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION requirements. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual specifications.

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\*Where specific instrument numbers are provided in parentheses they are for information only, and apply to each unit unless specifically noted (to assist in identifying associated instrument channels or loops) and are not intended to limit the requirements to the specific instruments associated with the number.

## APPLICABILITY

### LIMITING CONDITION FOR OPERATION (Continued)

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3.0.5 Unless specifically noted, all the information provided in the Limiting Condition for Operation including the associated ACTION requirements shall apply to each unit individually. In those cases where a specification makes reference to systems or components which are shared by both units, the affected systems or components will be clearly identified in parentheses or footnotes declaring the reference to be "common". Whenever the Limiting Condition for Operation refers to systems or components which are common, the ACTION requirements will apply to both units simultaneously. (This will be indicated in the ACTION section.) Whenever certain portions of a specification refer to systems, components, operating parameters, setpoints, etc., which are different for each unit, this will be identified in parentheses or footnotes or in the APPLICABILITY section as appropriate.

### SURVEILLANCE REQUIREMENTS

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4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Exceptions to these requirements are stated in the individual specifications. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation has been performed within the stated surveillance interval or as otherwise specified.

### 3/4.0 APPLICABILITY

#### BASES

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The intent of this provision is to ensure that facility operation is not initiated with either required equipment or systems inoperable or other specified limits being exceeded.

Exceptions to this provision have been provided for a limited number of specifications when startup with inoperable equipment would not affect plant safety. These exceptions are stated in the ACTION statements of the appropriate specifications.

3.0.5 This specification delineates the applicability of each specification to both Unit 1 and 2 operations. In order to make the Technical Specifications as clear and concise as possible the provisions of each specification, including the Limiting Condition for Operation and associated ACTION requirements, are equally applicable to Unit 1 or Unit 2 unless a specific exception is noted within the specification.

## APPLICABILITY

### BASES

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4.0.1 This specification provides that surveillance activities necessary to ensure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements. Surveillance Requirements for Special Test Exceptions need only be performed when the Special Test Exception is being utilized as an exception to an individual specification.

4.0.2 The provisions of this specification provide allowable tolerances for performing surveillance activities beyond those specified in the nominal surveillance interval. These tolerances are necessary to provide operational flexibility because of scheduling and performance considerations. The phrase "at least" associated with a surveillance frequency does not negate this allowable tolerance value and permits the performance of more frequent surveillance activities.

The allowable tolerance also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18 month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

4.0.3 The provisions of this specification set forth the criteria for determination of compliance with the OPERABILITY requirements of the Limiting Conditions for Operation. Under these criteria, equipment, systems or components are assumed to be OPERABLE if the associated surveillance activities have been satisfactorily performed within the specified time interval. Nothing in this provision is to be construed as defining equipment, systems or components OPERABLE when such items are found or known to be inoperable although still meeting the Surveillance Requirements. Items may be determined inoperable during use, during surveillance tests, or in accordance with this specification.

4.0.4 This specification ensures that the surveillance activities associated with a Limiting Condition for Operation have been performed within the specified time interval prior to entry into an OPERATIONAL MODE or other applicable condition. The intent of this provision is to ensure that surveillance activities have been satisfactorily demonstrated on a current basis as required to meet the OPERABILITY requirements of the Limiting Condition for Operation.

Under the terms of this specification, for example, during initial plant STARTUP or following extended plant outages, the applicable surveillance activities must be performed within the stated surveillance interval prior to placing or returning the system or equipment into OPERABLE status.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 33 TO FACILITY OPERATING LICENSE NPF-68  
AND AMENDMENT NO. 13 TO FACILITY OPERATING LICENSE NPF-81  
GEORGIA POWER COMPANY, ET AL.  
DOCKET NOS. 50-424 AND 50-425  
VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2

1.0 INTRODUCTION

By letter dated January 15, 1990, Georgia Power Company, et al. (the licensee) proposed a change to the Technical Specifications (TSs) for the Vogtle Electric Generating Plant (VEGP), Units 1 and 2. The proposed change removes the provision of Specification 4.0.2 that limits the combined time interval for three consecutive surveillances to less than 3.25 times the specified interval. Guidance on the proposed TS change was provided to all power reactor licensees and applicants by Generic Letter 89-14, dated August 21, 1989.

2.0 EVALUATION

Specification 4.0.2 includes the provision that allows a surveillance interval to be extended by 25 percent of the specified time interval. This extension provides flexibility for scheduling the performance of surveillances and permits consideration of whether the prevailing plant operating conditions are conducive for such testing. Such operating conditions include transient plant operation or ongoing surveillance or maintenance activities. Specification 4.0.2 further limits the allowance for extending surveillance intervals by requiring that the combined time interval for any three consecutive surveillances not exceed 3.25 times the specified time interval. This provision assures that surveillances are not extended repeatedly as an operational convenience resulting in an overall increase of the surveillance interval.

Experience has shown that the 18-month surveillance interval, with the provision to extend it by 25 percent, is usually sufficient to accommodate normal variations in the length of a fuel cycle. However, the NRC staff has routinely granted requests for one-time exceptions to the 3.25 limit on extending refueling surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. Therefore, the 3.25 limitation on extending any three consecutive surveillances has not practically limited the use of the 25-percent allowance for surveillances performed on a refueling outage basis.

Extending surveillance intervals during plant operation can result in a benefit to safety when a scheduled surveillance is due at a time when plant conditions are not suitable for conducting the surveillance. This may occur when the plant is in a transient operating condition or when safety systems are out of service and performance of the surveillance test would either further degrade plant safety system operability or unacceptably increase the risk of a challenge to plant safety systems. In such cases, the safety benefit of extending a surveillance interval exceeds any safety benefit derived by limiting the use of the 25-percent allowance for any three consecutive surveillance intervals and requiring performance of the surveillance. Furthermore, there is the administrative burden associated with tracking the use of the 25-percent allowance to ensure compliance with the 3.25 limit.

In view of these findings, the NRC staff concluded that Specification 4.0.2 should be changed to remove the 3.25 limit for all surveillances because its removal will have an overall positive effect on safety. The guidance provided in Generic Letter 89-14 included the following change to this specification and removes the 3.25 limit on three consecutive surveillances with the following statement:

"4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval."

The licensee's proposed change to TS 4.0.2 is consistent with the above recommended GL 89-14 guidance. In addition, the Bases of TS 4.0.2 were updated to reflect this change and therein it is noted that it is not the intent of the 25-percent allowance to repeatedly extend surveillance intervals merely for operational convenience. On the basis of its review of this matter, the staff finds that the above change to the TSs for Vogtle Units 1 and 2 is acceptable.

### 3.0 ENVIRONMENTAL CONSIDERATION

These amendments involve a change in surveillance requirements. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in 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. 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.

#### 4.0 CONCLUSION

The Commission's proposed determination that the amendments involve no significant hazards consideration was published in the Federal Register (55 FR 10533) on March 21, 1990. The Commission consulted with the State of Georgia. No public comments were received, and the State of Georgia did not have any comments.

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

Principal Contributors: Thomas G. Dunning, OTSB/DOEA  
Timothy A. Reed, PDII-3/DRP-I/II

Dated: July 31, 1990

DATED: July 31, 1990

AMENDMENT NO. 33 TO FACILITY OPERATING LICENSE NPF-68 - Vogtle Electric  
Generating Plant, Unit 1

AMENDMENT NO. 13 TO FACILITY OPERATING LICENSE NPF-81 - Vogtle Electric  
Generating Plant, Unit 2

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