

Docket Nos. 50-424
and 50-425

July 10, 1990

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. 31 TO FACILITY OPERATING LICENSE NPF-68
AND AMENDMENT NO. 11 TO FACILITY OPERATING LICENSE NPF-81 - VOGTLE
ELECTRIC GENERATING PLANT, UNITS 1 AND 2 (TACs 76847/76848)

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 31 to Facility Operating License No. NPF-68 and Amendment No. 11 to Facility Operating License 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 May 25, 1990.

The amendments revise TS Surveillance Requirement 4.8.1.1.2h(6)(c) by adding a note that allows the emergency diesel generator high jacket water temperature trip to be bypassed.

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

Sincerely,

1st

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

Enclosures:

- 1. Amendment No. 31 to NPF-68
- 2. Amendment No. 11 to NPF-81
- 3. Safety Evaluation

cc w/enclosures:
See next page

*See previous concurrence

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Your application requested that these amendments be treated as an emergency. A temporary waiver of compliance from the requirements of TS 4.8.1.1.2h(6)(c) was issued on May 25, 1990, while the amendments were being processed.

A copy of the related Safety Evaluation supporting the amendments is enclosed. Notice of issuance of the amendments and final determination of no significant hazards consideration and opportunity for hearing will be included in the Commission's biweekly Federal Register notice.

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Document Name: AMEND 76847/76848

DATED: July 10, 1990

AMENDMENT NO. 31 TO FACILITY OPERATING LICENSE NPF-68 - Vogtle Electric
Generating Plant, Unit 1

AMENDMENT NO. 11 TO FACILITY OPERATING LICENSE NPF-81 - Vogtle Electric
Generating Plant, Unit 2

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Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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*See previous concurrence

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7/5/90 subject to changes as marked

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Document Name: AMEND 76847/76848

Mr. W. G. Hairston, III
Georgia Power Company

Vogtle Electric Generating Plant

cc:

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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. 31
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 May 25, 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. 31, 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: July 10, 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. 11
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 1 (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 May 25, 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. 11, 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: July 10, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 31

FACILITY OPERATING LICENSE NO. NPF-68

AND LICENSE AMENDMENT NO. 11

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 page is identified by Amendment number and contains vertical lines indicating the areas of change. The corresponding overleaf page is also provided to maintain document completeness.

Amended Page

3/4 8-7

Overleaf Page

3/4 8-8

SURVEILLANCE REQUIREMENTS

auto-start signal; the steady-state generator voltage and frequency shall be maintained within these limits during this test;

- 6) Simulating a loss-of-offsite power in conjunction with an ESF Actuation test signal, and:
 - a) Verifying deenergization of the emergency busses and load shedding from the emergency busses;
 - b) Verifying the diesel starts on the auto-start signal, energizes the emergency busses with permanently connected loads within 11.5 seconds,* energizes the auto-connected emergency (accident) loads through the load sequencer and operates for greater than or equal to 5 minutes while its generator is loaded with the emergency loads. After energization, the steady-state voltage and frequency of the emergency busses shall be maintained at 4160 +170, -410 volts and 60 ± 1.2 Hz during this test; and
 - c) Verifying that all automatic diesel generator trips, except engine overspeed, low lube oil pressure, high jacket water temperatures### and generator differential, are automatically bypassed upon loss of voltage on the emergency bus concurrent with a Safety Injection Actuation signal.
- 7) Verifying the diesel generator operates for at least 24 hours. During the first 2 hours of this test, the diesel generator shall be loaded to an indicated 7600 to 7700 kW,** and during the remaining 22 hours of this test, the diesel generator shall be loaded to an indicated 6800-7000 kW.** The generator voltage and frequency shall be 4160 + 170, - 135 volts and 60 ± 1.2 Hz within 11.4 seconds after the start signal; the steady-state generator voltage and frequency shall be 4160 + 170, -410 volts and 60 ± 1.2 Hz during this test. Within 5 minutes after completing this 24-hour test, perform Specification 4.8.1.1.2h.6)b);##
- 8) Verifying that the auto-connected loads to each diesel generator do not exceed the continuous rating of 7000 kW;
- 9) Verifying the diesel generator's capability to:

*All engines starts for the purpose of surveillance testing as required by Specification 4.8.1.1.2 may be preceded by an engine prelube period as recommended by the manufacturer to minimize mechanical stress and wear on the diesel engine.

**This band is meant as guidance to avoid routine overloading of the engine. Loads in excess of this band or momentary variations due to changing bus loads shall not invalidate the test.

#Failure to maintain voltage and frequency requirements due to grid disturbances does not render a 24-hour test as a failure.

##If Specification 4.8.1.1.2h.6)b) is not satisfactorily completed, it is not necessary to repeat the preceding 24-hour test. Instead, the diesel generator may be operated at the load required by Surveillance Requirement 4.8.1.1.2.a5 kW for 1 hour or until operating temperature has stabilized.

###The high jacket water temperature trip may be bypassed.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- a) Synchronize with the offsite power source while the generator is loaded with its emergency loads upon a simulated restoration of offsite power,
 - b) Transfer its loads to the offsite power source, and
 - c) Be restored to its standby status.
- 10) Verifying that with the diesel generator operating in a test mode, connected to its bus, a simulated Safety Injection signal overrides the test mode by: (1) returning the diesel generator to standby operation, and (2) automatically energizing the emergency loads with offsite power;
- 11) Verifying that the fuel transfer pump transfers fuel from each fuel storage tank to the day tank of each diesel via the installed cross-connection lines;
- 12) Verifying that the automatic load sequence timer is OPERABLE with the interval between each load block within $\pm 10\%$ of its design interval;
- i. At least once per 10 years or after any modifications which could affect diesel generator interdependence by starting both diesel generators simultaneously, during shutdown, and verifying that both diesel generators accelerate to at least 440 rpm in less than or equal to 11.4 seconds; and
- j. At least once per 10 years by:
- 1) Draining each fuel oil storage tank, removing the accumulated sediment and cleaning the tank using a sodium hypochlorite solution, or equivalent, and
 - 2) Performing a pressure test of those portions of the diesel fuel oil system designed to Section III, subsection ND of the ASME Code at a test pressure equal to 110% of the system design pressure.

4.8.1.1.3 Reports - All diesel generator failures, valid or nonvalid, shall be reported to the Commission in a Special Report pursuant to Specification 6.8.2 within 30 days. Reports of diesel generator failures shall include the information recommended in Regulatory Position C.3.b of Regulatory Guide 1.108, Revision 1, August 1977. If the number of failures in the last 100 valid tests on a per nuclear unit basis is greater than or equal to 7, the report shall be supplemented to include the additional information recommended in Regulatory Position C.3.b of Regulatory Guide 1.108, Revision 1, August 1977.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 31 TO FACILITY OPERATING LICENSE NPF-68
AND AMENDMENT NO. 11 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 May 25, 1990, Georgia Power Company (GPC), et al. (the licensee), requested a Technical Specification (TS) amendment to allow the Vogtle Electric Generating Plant (VEGP) Emergency Diesel Generator (EDG) high jacket water temperature (HJWT) trip to be bypassed to minimize the potential for spurious diesel generator trips in the emergency start mode. Specifically, the requested change would revise TS 4.8.1.1.2h(6)(c) to add a note (###) that states "the high jacket water temperature trip may be bypassed." The requested change results from GPC's desire to install a modification that adds isolation valves in the instrument tubing between the EDG HJWT elements and the local EDG control panel. The installed valves would then be normally closed so that the HJWT sensors would not provide input to the EDG trip logic for emergency start signals. The isolation valves may be opened to enable the jacket water trip for non-emergency manual starts or EDG surveillance tests.

2.0 EVALUATION

The criteria which govern whether an EDG trip can be bypassed for emergency or normal EDG starts are provided in Revision 2 of Regulatory Guide 1.9. Position 7 of Regulatory Guide 1.9, Revision 2, states that all diesel generator protective trips should be either bypassed when the diesel generator is required for a design-basis event or implemented with two or more independent measurements with coincident logic provisions. All protective trips are allowed during periodic testing. The allowed exceptions to the above requirements for bypassing are diesel engine overspeed and generator differential current. Currently, all the protective trips on the VEGP EDGs except engine overspeed, generator differential, low lube oil pressure, and HJWT are bypassed during an emergency start. The low lube oil pressure and HJWT trips are implemented by three independent measurements for each trip parameter. Actuation of these trips is initiated by two-out-of-three coincident logic. The current design satisfies the requirements of Position 7 of Regulatory Guide 1.9.

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Regulatory Guide 1.9, Revision 2, allows the HJWT trip to be bypassed under accident conditions provided the operator has sufficient time to react appropriately to an abnormal diesel generator condition. The proposed TS change and associated plant modification would bypass the HJWT trip for all emergency starts while maintaining the local and control room alarms for abnormal jacket water temperature. The alarms would provide the operator with an indication of abnormal conditions and provide sufficient time for the operator to take actions to mitigate the condition. Although there is an increased potential for diesel generator damage due to loss of engine cooling during emergency starts, the operating experience to date at Vogtle indicates that it is outweighed by the increased EDG reliability achieved with the commensurate benefit to overall plant safety. Accordingly, the NRC staff finds that the proposed TS change to Surveillance Requirement 4.8.1.1.2h(6)(c) and the associated plant modification meet the intent of Regulatory Guide 1.9, Revision 2, and are acceptable.

With regard to the impact of the proposed TS change on events postulated in the updated VEGP Final Safety Analysis Report (FSAR), the bypassing of the HJWT trip will not affect the capability of the EDG to mitigate those design basis events in which the preferred offsite power source is postulated to fail. The accident analyses postulated in the VEGP FSAR do not take credit for a restart of an EDG. If an EDG should fail from a loss of engine cooling (worst single failure), emergency onsite AC power would be provided by the redundant EDG and associated electrical train. Consequently, the proposed TS change does not impact plant safety as analyzed in the updated VEGP FSAR.

3.0 EXIGENT CIRCUMSTANCES

The Commission's regulations, 10 CFR 50.91, contain provisions for issuance of amendments when the usual 30-day public notice period cannot be met. One type of special exception is an exigency. An exigency is a case where the staff and licensee need to act promptly, but failure to act promptly does not necessarily involve a plant shutdown, derating, or delay in startup. As described below, the requested TS amendment and associated plant modification represent a safety enhancement.

On May 23, 1990, the licensee entered the 72 hour action statement associated with TS 3.8.1 after the Unit 1 "B" EDG failed the applicable Surveillance Requirements. Troubleshooting and additional EDG testing indicated that the most likely cause for the failure was the HJWT switches. These switches were new and had been recently installed and calibrated per the revised calibration procedure (incorporating the lessons learned from the Wyle Lab tests). Given that the most probable root cause for the EDG failure was the same as the root cause (HJWT switches) for the March 20, 1990, loss of all vital AC event, and given the repeated difficulties the licensee has experienced with HJWT trips, the licensee determined that the best resolution was to bypass the HJWT trip for all emergency starts. The licensee promptly notified the NRC of its intentions to install a modification to manually bypass the HJWT trip and the need for an expedited TS change to TS 4.8.1.1.2h(6)(c). The licensee then subsequently processed the TS change request and plant modification in an expeditious manner.

The licensee left the 72 hour action statement of Limited Condition for Operation 3.8.1 on May 25, 1990, after having reinstalled the original HJWT switches into the 1B EDG and successfully performing the required surveillance testing. However, given recent operating experience, particularly the March 20, 1990 event, and the difficulties experienced with HJWT trips, the licensee thought it prudent in terms of enhanced plant safety to request the TS change on an expedited basis. The NRC staff concurred with the licensee's assessment and provided a Temporary Waiver of Compliance on May 25, 1990, from SR 4.8.1.1.2h(6)(c) until such time that a TS amendment could be processed.

The Commission notified the public by publishing a notice in the Federal Register on June 22, 1990 (55 FR 25756). The notice provided an opportunity for hearing and allowed 15 days for public comments on a proposed determination of no significant hazards consideration. There were no public comments in response to the notice published in the Federal Register.

4.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The amendment request would revise the existing TS Surveillance Requirement 4.8.1.1.2h(6)(c) to add a note that allows the HJWT trip to be bypassed. Essentially, the proposed change allows the EDGs to be started on an emergency signal (Safety Injection (SI) signal, Loss of Offsite Power (LOSP) signal, or Emergency Manual Start signal) with the HJWT trip bypassed.

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards consideration if operation of the facility in accordance with the amendment would not:

- (1) Involve a significant increase in the probability or consequences of any accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

The licensee has provided the following analysis regarding no significant hazards consideration using the Commission's standards.

In order to accommodate the current design, the TSs require verification that all automatic diesel generator trips are automatically bypassed upon loss of voltage on the emergency bus concurrent with a Safety Injection Actuation signal, except for engine overspeed, generator differential, low lube oil pressure and HJWT. The proposed TS change will note that the jacket water temperature trip may be bypassed. The HJWT trip is designed to protect the diesel generator from a loss of engine cooling. For such an event, the safety functions would be provided by the diesel for the other train. During an accident, the advantage of the automatic trip is small relative to the increased reliability achieved by reducing the possibility of a spurious trip.

This change will not increase the probability of an accident previously evaluated because it does not affect any of the design basis events that have been previously evaluated in the FSAR. The analyses of accident consequences do not take credit for the ability to restart a diesel following a diesel generator trip. Therefore, this change will not affect the previously evaluated consequences.

The revision to the TSs will not create the possibility of a new or different kind of accident from any accident previously evaluated. No new modes of operation are being imposed on the plant and the diesel generators will continue to perform their function as designed.

The revision will not result in a significant reduction in the margin of safety provided for events involving a loss of electrical power. The proposed revision will allow the implementation of a modification which is intended to improve the reliability of the diesel generators by minimizing the possibility of spurious trips.

Based on the preceding analysis, the licensee determined that the proposed change to the TSs would not involve a significant increase in the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any previously evaluated or involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's no significant hazards consideration determination and agrees with the licensee's analysis. Accordingly, the staff finds that the requested amendments do not involve a significant hazards consideration.

5.0 STATE CONSULTATION

In accordance with the Commission's regulations, the State of Georgia was contacted on May 25, 1990. The state representative had no comments.

6.0 ENVIRONMENTAL CONSIDERATION

These amendments involve a change to a TS Surveillance Requirement. 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 NRC staff has made a final determination that the amendments involve no significant hazards consideration. 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 these amendments.

7.0 CONCLUSION

We have 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, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

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