

August 5, 1985

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Dockets Nos. 50-321
and 50-366

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SECY

Mr. J. T. Beckham, Jr.
Vice President - Nuclear Generation
Georgia Power Company
P. O. Box 4545
Atlanta, Georgia 30302

Dear Mr. Beckham:

The Commission has issued Amendments Nos. 112 and 51 to Facility Operating Licenses Nos. DPR-57 and NPF-5 for the Edwin I. Hatch Nuclear Plant, Units Nos. 1 and 2. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated November 19, 1984, which effectively superseded previous submittals concerning snubber Technical Specifications as discussed in the enclosed Safety Evaluation.

Notice of issuance will be included in the Commission's next Biweekly Federal Register Notice.

Sincerely,

Original signed by

George W. Rivenbark, Project Manager
Operating Reactors Branch #4
Division of Licensing

Enclosures:

1. Amendment No. 112 to DPR-57
2. Amendment No. 51 to NPF-5
3. Safety Evaluation

cc w/enclosures:
See next page

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LEngle
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Mr. J. T. Beckham, Jr.
Georgia Power Company

Edwin I. Hatch Nuclear Plant,
Units Nos. 1 and 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. 50-321
EDWIN I. HATCH NUCLEAR PLANT, UNIT NO. 1
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 112
License No. DPR-57

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Georgia Power Company, et al., (the licensee) dated November 19, 1984, 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;
 - D. The issuance of this 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 amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-57 is hereby amended to read as follows:

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PDR ADDCK 05000321
P PDR

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 112, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective immediately, to be implemented within 30 days of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: August 5, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 112

FACILITY OPERATING LICENSE NO. DPR-57

DOCKET NO. 50-321

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain a vertical line indicating the area of change.

<u>Remove</u>	<u>Insert</u>
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3/4.6.L SNUBBERS

LIMITING CONDITION FOR OPERATION

3.6.L All snubbers* shall be OPERABLE. The only snubbers excluded from this requirement are those installed on non-safety 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: Conditions 1, 2, and 3.

ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.6.L.3 on the supported component or declare the supported system inoperable and follow the appropriate limiting condition of operation statement(s) for that system.

SURVEILLANCE REQUIREMENTS

4.6.L Each snubber shall be demonstrated OPERABLE by performance of the following inservice inspection program.

1. Visual Inspections

All safety-related snubbers shall be visually examined to verify snubber operability. Visual inspections shall be performed in accordance with the following schedule:

<u>No. Inoperable Snubbers per Inspection Period</u>	<u>Subsequent Visual Inspection Period**</u>
0	18 months + 25%
1	12 months + 25%
2	6 months + 25%
3, 4	124 days + 25%
5, 6, 7	62 days + 25%
8 or more	31 days + 25%

The snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

2. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) for mechanical snubbers where snubber movement can be manually induced, the snubbers shall be inspected as follows: (a) At each refueling,

*The applicable snubbers shall be identified in plant procedures.

**The inspection interval shall not be lengthened more than one step at a time.

3/4.6.L SNUBBERS

SUPVEILLANCE REQUIREMENTS (Continued)

systems associated with the safety-related mechanical snubbers shall be inspected to determine if there has been a severe dynamic event.

(b) In the event of a severe dynamic event, snubbers in that system which experienced the event shall be inspected during the refueling outage to assure the snubbers have freedom of movement and are not frozen up. The inspection shall consist of verifying freedom of motion using one of the following: (i) Manually induced snubber movement; (ii) stroking the mechanical snubber through its full range of travel. If one or more mechanical snubbers are found to be frozen up during this inspection, those snubbers shall be replaced (or overhauled) before returning to power. Re-inspection shall subsequently be performed according to the schedule of 4.6.L.1, but the scope of the examination shall be limited to the systems associated with the safety-related mechanical snubbers. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the "as found" condition and determined OPERABLE per Specification 4.6.L.4 or 4.6.L.5, as applicable. However, if a hydraulic snubber is found to contain less than the required minimum volume of reserve fluid or if visible signs of leakage are present, the snubber shall be determined inoperable and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval.

3. Functional Tests

At least once per 18 months during shutdown, a representative sample of 10% of the total of each type (hydraulic or mechanical) safety-related snubber in use in the plant shall be functionally tested either in place or in a bench test. For each snubber that does not meet the functional test acceptance criteria of Specification 4.6.L.4 or 4.6.L.5, an additional sample of at least 1/2 the size of the initial lot of that type of snubber shall be functionally tested.

Functional testing shall continue until no additional inoperable snubbers of a particular type are found within a sample or until all safety-related snubbers of that type have been functionally tested.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. The representative sample shall be selected randomly from the total population of safety-related snubbers. At least 25% of the snubbers in the

3/4.6.L SNUBBERS

SURVEILLANCE REQUIREMENTS (Continued)

representative sample shall include snubbers from the following three categories:

1. The first snubber away from each reactor vessel nozzle,
2. Snubbers within 5 feet of heavy equipment (valve, pump, turbine, motor, etc.), and
3. Snubbers within 10 feet of the discharge from a safety-relief valve.

Snubbers identified in plant procedures as "Especially Difficult to Remove" or in "High Radiation Zones During Shutdown" shall also be included in the representative sample*. The populations of safety-related hydraulic and safety-related mechanical snubbers may be used jointly or separately as the basis for the sampling plan.

In addition to the regular sample, snubbers placed in the same location as snubbers which failed the previous functional test shall be retested during the next test period. Test results of these snubbers shall not be included in the sampling plan.

If any snubber selected for functional testing either fails to lockup or fails to move, i.e., frozen in place, the cause will be evaluated and if caused by manufacturer or design deficiency all snubbers of the same design subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated above for snubbers not meeting the functional test criteria.

For the snubber(s) found inoperable, an engineering evaluation shall be performed on the components which are supported by the snubber(s). The purpose of this engineering evaluation shall be to determine if the components supported by the snubber(s) were adversely affected by the inoperability of the snubber(s) in order to ensure that the supported component remains capable of meeting the designed service.

4. Hydraulic Snubbers Functional Test Acceptance Criteria

The hydraulic snubber functional test shall verify that:

*Permanent or other exemptions from functional testing for individual snubbers in those categories may be granted by the Commission only if a justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion or their fabrication or at a subsequent date.

3/4.6.L SNUBBERS

SURVEILLANCE REQUIREMENTS (Continued)

- a. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
- b. Snubber bleed, or release rate, where required, is within the specified range in compression or tension. For snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

5. Mechanical Snubbers Functional Test Acceptance Criteria

The mechanical snubber functional test shall verify that:

- a. The snubber operates freely over the stroke in both tension and compression.
- b. The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force.
- c. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.

6. Unit Outage Inaccessible Snubber Inspection

In the event that all inaccessible snubbers are inspected, functionally tested, and repaired as necessary during a unit outage, and that it is thus demonstrated that all inaccessible snubbers are operable, the schedule in Specification 4.6.L.1 may be re-entered on a 6-month inspection interval for the inaccessible snubbers.

7. Snubber Service Life Monitoring

A record of the service life of each snubber, the date at which the designated service life commences and the installation and maintenance records on which the designated service life is based shall be maintained as required by Specification 6.10.2.n.

Concurrent with the inservice visual inspection performed during the first refueling outage following issuance of this amendment and at least once per 18 months thereafter, the installation and maintenance records for each safety-related snubber shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded by more than 10% prior to the next scheduled snubber service life review. If the indicated service life will be exceeded by more than 10% prior to the next scheduled snubber service life review, the snubber service life shall be reevaluated or the snubber shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review. The results of the reevaluation may be used to justify a change to the service life of the snubber. This reevaluation replacement or reconditioning shall be indicated in the records.

BASES

3/4.6.L SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program 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.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval varies inversely with the observed snubber failures and is determined by the number of inoperable snubbers found during an inspection. Inspections performed before the interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

When the cause of the rejection of a snubber is clearly established and remedied for the snubber and for any other snubbers that may be generically susceptible, and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

When a snubber is found inoperable, an engineering evaluation is performed, in addition to the determination of the snubber mode of failure, in order to determine if any safety-related component or system has been adversely affected by the inoperability of the snubber. The engineering evaluation shall determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at 18-month intervals. Observed failures of sample snubbers shall require functional testing of additional units.

Hydraulic snubbers and mechanical snubbers may each be treated as a different entity for the above surveillance programs.

BASES

3/4.6.L SNUBBERS (Continued)

The service life of a snubber is evaluated via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, 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. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

RECORD RETENTION (Continued)

- c. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Table 5.7.1-1.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the PRB and SRB.
- l. Records for Environmental Qualification which are covered under the provisions of paragraph 6.15.
- m. Records of analyses required by the Radiological Environmental Monitoring Program.
- n. Records of the service lives of all safety-related hydraulic and mechanical snubbers including the date at which the service life commences and associated installation and maintenance records.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit*. Any individual or group of individuals permitted

*Health Physics personnel, or personnel escorted by Health Physics personnel in accordance with approved emergency procedures, shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.



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. 50-366

EDWIN I. HATCH NUCLEAR PLANT, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 51
License No. NPF-5

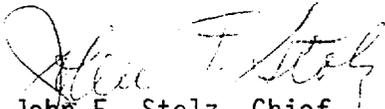
1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Georgia Power Company, et al., (the licensee) dated November 19, 1984, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's 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;
 - D. The issuance of this 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 amended by 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-5 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 51, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective immediately, to be implemented within 30 days of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: August 5, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 51

FACILITY OPERATING LICENSE NO. NPF-5

DOCKET NO. 50-366

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain a vertical line indicating the area of change.

<u>Remove</u>	<u>Insert</u>
VIII	VIII
XIII	XIII
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PLANT SYSTEMS

3/4.7.4 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.4 All snubbers* shall be operable. The only snubbers excluded from this requirement are those installed on non-safety 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: Conditions 1, 2, and 3.

ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.4.c on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.4 Each snubber shall be demonstrated OPERABLE by performance of the following inservice inspection program and the requirements of Specification 4.0.5.

a. Visual Inspections

All safety-related snubbers shall be visually examined to verify snubber operability. Visual inspections shall be performed in accordance with the following schedule:

<u>No. Inoperable Snubbers per Inspection Period</u>	<u>Subsequent Visual Inspection Period**#</u>
0	18 months + 25%
1	12 months + 25%
2	6 months + 25%
3, 4	124 days + 25%
5, 6, 7	62 days + 25%
8 or more	31 days + 25%

The snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

*The applicable snubbers shall be identified in plant procedures.

**The inspection interval shall not be lengthened more than one step at a time.

#The provisions of Specification 4.0.2 are not applicable.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

b. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) for mechanical snubbers where snubber movement can be manually induced, the snubbers shall be inspected as follows: (a) At each refueling, systems associated with the safety-related mechanical snubbers shall be inspected to determine if there has been a severe dynamic event. (b) In the event of a severe dynamic event, snubbers in that system which experienced the event shall be inspected during the refueling outage to assure the snubbers have freedom of movement and are not frozen up. The inspection shall consist of verifying freedom of motion using one of the following: (i) Manually induced snubber movement; (ii) stroking the mechanical snubber through its full range of travel. If one or more mechanical snubbers are found to be frozen up during this inspection, those snubbers shall be replaced (or overhauled) before returning to power. Re-inspection shall subsequently be performed according to the schedule of 4.7.4.a, but the scope of the examination shall be limited to the systems associated with the safety-related mechanical snubbers. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the "as found" condition and determined OPERABLE per Specification 4.7.4.d or 4.7.4.e, as applicable. However, if a hydraulic snubber is found to contain less than the required minimum volume of reserve fluid or if visible signs of leakage are present, the snubber shall be determined inoperable and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval.

c. Functional Tests

At least once per 18 months during shutdown, a representative sample of 10% of the total of each type (hydraulic or mechanical) safety-related snubber in use in the plant shall be functionally tested either in place or in a bench test. For each snubber that does not meet the functional test acceptance criteria of Specification 4.7.4.d or 4.7.4.e, an additional sample of at least 1/2 the size of the initial lot of that type of snubber shall be functionally tested.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

Functional testing shall continue until no additional inoperable snubbers of a particular type are found within a sample or until all safety-related snubbers of that type have been functionally tested.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. The representative sample shall be selected randomly from the total population of safety-related snubbers. At least 25% of the snubbers in the representative sample shall include snubbers from the following three categories:

1. The first snubber away from each reactor vessel nozzle,
2. Snubbers within 5 feet of heavy equipment (valve, pump, turbine, motor, etc.), and
3. Snubbers within 10 feet of the discharge from a safety relief valve.

Snubbers identified in plant procedures as "Especially Difficult to Remove" or in "High Radiation Zones During Shutdown" shall also be included in the representative sample*. The populations of safety-related hydraulic and safety-related mechanical snubbers may be used jointly or separately as the basis for the sampling plan.

In addition to the regular sample, snubbers placed in the same location as snubbers which failed the previous functional test shall be retested during the next test period. Test results of these snubbers shall not be included in the sampling plan.

If any snubber selected for functional testing either fails to lockup or fails to move, i.e., frozen in place, the cause will be evaluated and if caused by manufacturer or design deficiency all snubbers of the same design subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated above for snubbers not meeting the functional test criteria.

For the snubber(s) found inoperable, an engineering evaluation shall be performed on the components which are supported by the snubber(s). The purpose of this engineering evaluation shall be to determine if the components supported by the snubber(s) were adversely affected by the inoperability of the snubber(s) in order to ensure that the supported component remains capable of meeting the designed service.

*Permanent or other exemptions from functional testing for individual snubbers in those categories may be granted by the Commission only if a justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

d. Hydraulic Snubbers Functional Test Acceptance Criteria

The hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
2. Snubber bleed, or release rate, where required, is within the specified range in compression or tension. For snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

e. Mechanical Snubbers Functional Test Acceptance Criteria

The mechanical snubber functional test shall verify that:

1. The snubber operates freely over the stroke in both tension and compression.
2. The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force.
3. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.

f. Unit Outage Inaccessible Snubber Inspection

In the event that all inaccessible snubbers are inspected, functionally tested, and repaired as necessary during a unit outage, and that it is thus demonstrated that all inaccessible snubbers are operable, the schedule in Specification 4.7.4.a may be re-entered on a 6-month inspection interval for the inaccessible snubbers.

g. Snubber Service Life Monitoring

A record of the service life of each snubber, the date at which the designated service life commences and the installation and maintenance records on which the designated service life is based shall be maintained as required by Specification 6.10.2.π.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

Concurrent with the inservice visual inspection performed during the first refueling outage following issuance of this amendment and at least once per 18 months thereafter, the installation and maintenance records for each safety-related snubber shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded by more than 10% prior to the next scheduled snubber service life review. If the indicated service life will be exceeded by more than 10% prior to the next scheduled snubber service life review, the snubber service life shall be reevaluated or the snubber shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review. The results of the reevaluation may be used to justify a change to the service life of the snubber. This reevaluation, replacement or reconditioning shall be indicated in the records.

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HATCH - UNIT 2

3/4 7-17

Amendment No. 51

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3/4.7 PLANT SYSTEMS

BASES

REACTOR CORE ISOLATION COOLING SYSTEM (Continued)

The surveillance requirements provide adequate assurance that RCIC will be OPERABLE when required. Although all active components are testable and full flow can be demonstrated by recirculation during reactor operation, a complete functional test requires reactor shutdown. The pump discharge piping is maintained full to prevent water hammer damage and to start cooling at the earliest moment.

3/4.7.4 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program 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.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval varies inversely with the observed snubber failures and is determined by the number of inoperable snubbers found during an inspection. Inspections performed before the interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

When the cause of the rejection of a snubber is clearly established and remedied for the snubber and for any other snubbers that may be generically susceptible, and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

When a snubber is found inoperable, an engineering evaluation is performed, in addition to the determination of the snubber mode of failure, in order to determine if any safety-related component or system has been adversely affected by the inoperability of the snubber. The engineering evaluation shall determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at 18-month intervals. Observed failures of sample snubbers shall require functional testing of additional units.

Hydraulic snubbers and mechanical snubbers may each be treated as a different entity for the above surveillance programs.

PLANT SYSTEMS

BASES

3/4.7.4 SNUBBERS (Continued)

The service life of a snubber is evaluated via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, 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. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

3/4.7.5 SEALED SOURCE CONTAMINATION

The limitations on sealed source removable contamination ensure that the total body or individual organ irradiation does not exceed allowable limits in the event of ingestion or inhalation of the source material. The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. Quantities of interest to this specification which are exempt from the leakage testing are consistent with the criteria of 10 CFR Part 30.11-20 and 70.19. Leakage from sources excluded from the requirements of this specification is not likely to represent more than one maximum permissible body burden for total body irradiation if the source material is inhaled or ingested.

3/4.7.6 FIRE SUPPRESSION SYSTEMS

The OPERABILITY of the fire suppression systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety-related equipment is located. The fire suppression system consists of the water system, spray and/or sprinklers, CO₂, and fire hose stations. The collective capability of the fire suppression systems is adequate to minimize potential damage to safety-related equipment and is a major element in the facility fire protection program.

In the event that portions of the fire suppression systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service.

In the event the fire suppression water system becomes inoperable, immediate corrective measures must be taken since this system provides the major fire suppression capability of the plant. The requirement for a twenty-four hour report to the Commission provides for prompt evaluation of the acceptability of the corrective measures to provide adequate fire suppression capability for the continued protection of the nuclear plant.

PLANT SYSTEMS

BASES

3/4.7.7 PENETRATION FIRE BARRIERS

The functional integrity of the penetration fire barriers ensures that fires will be confined or adequately retarded from spreading to adjacent portions of the facility. This design feature minimizes the possibility of a single fire rapidly involving several areas of the facility prior to detection and extinguishment. The penetration fire barriers are a passive element in the facility fire protection program and are subject to periodic inspections.

During periods of time when the barriers are not functional, a continuous fire watch is required to be maintained in the vicinity of the affected barrier until the barrier is restored to functional status unless the OPERABILITY of the fire detection instruments, providing coverage of the fire detection zones on each side of the non-functional barriers, has been demonstrated.

3/4.7.8 SETTLEMENT OF CLASS 1 STRUCTURES

In order to assure that settlement does not exceed predicted and allowable settlement values, a program has been established to conduct a survey at the site.

The allowable total and differential settlement values are based on original settlement predictions. In establishing these tabulated values, an assumption is made that pipe and conduit connections have been designed to safely withstand the stresses which would develop due to total and differential settlement.

RECORD RETENTION (Continued)

- c. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Table 5.7.1-1.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the PRB and SRB.
- l. Records for Environmental Qualification which are covered under the provisions of paragraph 6.15.
- m. Records of analyses required by the Radiological Environmental Monitoring Program.
- n. Records of the service lives of all safety-related hydraulic and mechanical snubbers, including the date at which the service life commences and associated installation and maintenance records.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit*. Any individual or group of individuals permitted

*Health Physics personnel, or personnel escorted by Health Physics personnel in accordance with approved emergency procedures, shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO.112 TO FACILITY OPERATING LICENSE NO. DPR-57
AND AMENDMENT NO. 51 TO FACILITY OPERATING LICENSE NO. NPF-5

GEORGIA POWER COMPANY
OGLETHORPE POWER CORPORATION
MUNICIPAL ELECTRIC AUTHORITY OF GEORGIA
CITY OF DALTON, GEORGIA

EDWIN I. HATCH NUCLEAR PLANT, UNITS NOS. 1 AND 2

DOCKETS NOS. 50-321 AND 50-366

INTRODUCTION

Georgia Power Company's (the licensee) letter dated November 19, 1984, requested amendments to the Hatch Units 1 and 2 Technical Specifications (TSs). This letter superseded a May 2, 1984, submittal which had previously replaced submittals dated April 14, 1981, April 30, 1982 and October 27, 1983, as supplemented December 20, 1983. The proposed amendments consist of revisions to the snubber TSs (Unit 1, Sections 3/4.6.L and Unit 2, Sections 3/4.7.4) pursuant to an NRC Generic Letter dated November 20, 1980, Subject - Technical Specification Revisions for Snubber Surveillance and NRC Generic Letter 84-13, dated May 3, 1984, Subject - Technical Specification for Snubbers.

EVALUATION

In order to conform with guidance provided by NRC in the NRC Generic Letters referenced in the introduction above, and with additional guidance provided by NRC to recently licensed facilities, the licensee proposed the following changes to the snubber TSs:

- a. Revised the Limiting Condition for Operation (LCO) to require that mechanical as well as hydraulic safety-related snubbers be operable.
- b. Deleted tables containing listings of safety-related hydraulic snubbers from the TSs. Deletion of these tables will eliminate the need for frequent TS amendments to incorporate changes in snubber listings. This change is in accordance with Generic Letter 84-13. The licensee will maintain lists of all safety-related (both mechanical and hydraulic) snubbers in the plant surveillance procedures. Changes to the lists are subject to the provisions of 10 CFR Part 50.59.
- c. Revised the "Action" statement for the LCO pertaining to snubbers to require, when one or more snubbers are inoperable, an engineering evaluation on the supported component or declare the supported system inoperable if the snubbers cannot be replaced or repaired in 72 hours.

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- d. Revised visual inspection acceptance criteria to conform with that contained in Section 4.7.9.b of the Standard Technical Specifications (STSS) which were enclosures to the above referenced Generic Letter.
- e. Added a requirement for inspection of mechanical snubbers to determine if there has been a severe dynamic (transient) event.
- f. Revised functional test requirements to conform, except for additional snubber testing discussed in paragraph g below, with that contained in Section 4.7.9.c of the STSS.
- g. Revised requirements pertaining to numbers of additional snubbers to be tested for each snubber tested that does not meet the functional test acceptance criteria.

The revised TS requires, that for each snubber that does not meet the functional test acceptance criteria, testing an additional sample equal to one-half of the number of snubbers in the initial test sample of that type of snubber.

- h. Added functional test acceptance criteria for mechanical snubbers.
- i. Added a statement to Unit 2 TSs to permit reinspection of inaccessible snubbers, or six-month inspection interval in the event that, during a unit outage, all inaccessible snubbers are inspected, functionally tested and repaired as necessary and thus demonstrated to be operable. This statement is presently in the existing Unit 1 TSs.
- j. Added a requirement for a service-life monitoring program for all safety-related snubbers, including the retention of installation and maintenance records to demonstrate this program.

Based on our review, we find the proposed amendments to the Hatch Units 1 and 2 TSs to be substantially in conformance with the guidance provided by the NRC and conclude that they will enhance the safety of Hatch Units 1 and 2 and are acceptable.

ENVIRONMENTAL CONSIDERATIONS

The amendments involve a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes in surveillance requirements. We have 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.

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.

Dated: August 5, 1985

Principal Contributor: J. Lenahan