

April 30, 1993

Docket Nos. 50-321
and 50-366

Mr. W. G. Hairston, III
Senior Vice President -
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Georgia Power Company
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Dear Mr. Hairston:

SUBJECT: ISSUANCE OF AMENDMENTS - EDWIN I. HATCH NUCLEAR PLANT,
UNITS 1 AND 2 (TAC NOS. M79919 AND M79920)

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 185 to Facility Operating License DPR-57 and Amendment No.125 to Facility Operating License NPF-5 for the Edwin I. Hatch Nuclear Plant, Units 1 and 2. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated February 26, 1991, as supplemented February 4 and December 21, 1992, and February 17, 1993.

The amendments revise various instrumentation surveillance requirements for both Hatch units.

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

Sincerely,

ORIGINAL SIGNED BY:

Kahtan N. Jabbour, Project Manager
Project Directorate II-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 185 to DPR-57
2. Amendment No. 125 to NPF-5
3. Safety Evaluation

cc w/enclosures:
See next page

OFFICE	PDII-3/VA	PDII-3/PM	OGC	PD II	
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DATE	4/19/93	4/19/93	4/21/93	4/30/93	

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

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 185 TO FACILITY OPERATING LICENSE DPR-57
AND AMENDMENT NO. 125 TO FACILITY OPERATING LICENSE NPF-5

GEORGIA POWER COMPANY, ET AL.

EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-321 AND 50-366

1.0 INTRODUCTION

By letter dated February 26, 1991, as supplemented February 4 and December 21, 1992, and February 17, 1993, Georgia Power Company, et al. (GPC or the licensee), proposed license amendments to change the Technical Specifications (TS) for the Edwin I. Hatch Nuclear Plant, Units 1 and 2. The proposed changes incorporate allowable out-of-service times (AOT) for surveillance and repair with extended functional test intervals for Emergency Core Cooling (ECCS), Isolation Actuation Instrumentation, Reactor Protection System (RPS), control rod blocks, Reactor Core Isolation Cooling (RCIC), and selected instrumentation as outlined in General Electric Topical Reports NEDC-30936P-A, Part 2, NEDC-31677P-A, NEDC-30851P-A, NEDC-30851P-A (Supplements 1 and 2), GENE-770-06-1, and GENE-770-06-2. These reports utilize a probabilistic approach to establish a technical basis for extending surveillance test intervals and allowable out-of-service times. The results of the analysis show the effect on the probability of failure to actuate is negligible for the extended surveillance intervals and AOTs proposed for ECCS, Isolation Actuation Instrumentation, RPS, control rod blocks, RCIC, and selected instrumentation. The referenced licensing topical reports were previously reviewed by the staff and found to be acceptable. The staff issued Generic Safety Evaluation Reports approving the results of the analysis and specifying the requirements for plant-specific application.

The December 21, 1992, and February 17, 1993, letters provided additional information in support of the above changes. The letters did not change the NRC staff's proposed no significant hazards consideration determination as published in the Federal Register on April 15, 1992 (57 FR 13131).

The Hatch Unit 1 TS do not provide complete AOT for testing or repair. The TS requires this instrumentation to be operable or tripped. The licensee currently controls the AOT administratively based on a TS notation for RPS allowing an instrument to be out of service for a brief period of time. In the absence of a repair/test AOT, it would normally be expected that the action statement/LCO would be entered when a system is inoperable during required surveillance testing. The Hatch Unit 1 TS provide, limited allowances and time limits for ECCS or isolation actuation instrumentation

surveillance testing. The Unit 2 TS provide test and repair AOTs consistent with the Standard Technical Specifications (STS) for isolation actuation instrumentation and limited allowances and time limits for ECCS instrumentation. The STS allow a channel (instrument) to be inoperable for a specified period of time in order to perform surveillance testing.

To provide for required instrument surveillance testing the licensee proposed AOT of 6 hours for the surveillance of referenced topical report instrumentation. The licensee also proposed 6 hour surveillance test AOTs for instrumentation not specifically addressed by the referenced topical reports or the STS. A repair AOT for 12 hours is also proposed for ECCS, Isolation Actuation and additional topical report related instrumentation. The surveillance functional test intervals for ECCS, Isolation Actuation, and additional instrumentation have been revised from once per month to quarterly based on reliability analysis results presented in the referenced GE topical reports.

The licensee proposed to revise the isolation actuation and selected instrumentation tables in the Unit 1 TS to more closely resemble the Unit 2 TS. Changes to the RPS, bases, and various editorial changes were also proposed for both units.

The licensee performed an evaluation of GE topical reports NEDC-30936-A Part 2, NEDC-31677P-A, NEDC-30851P-A, NEDC-30851P-A (Supplements 1 and 2), GENE-770-06-1, and GENE-770-06-2 and concluded that the topical report generic analysis is applicable to Hatch Units 1 and 2.

By letter dated April 27, 1988, from C. Rossi (NRC) to the BWR Owners Group, the NRC requested licensees to examine plant setpoint drift data over a sufficient period to demonstrate that the drift expected with extended surveillance intervals is within the existing calculated setpoint allowance or that the allowance and/or setpoint have been adjusted to account for the expected increase in drift. No additional information was requested for staff review by the above referenced letter. However, records showing the actual setpoint calculation and supporting data should be retained onsite for possible future staff audit.

The licensee reviewed the plant setpoint calculations (drift) associated with the affected instrumentation and determined that the existing setpoint drift calculations bound the proposed quarterly functional test surveillance interval. No revision to instrument setpoint values or allowances were required.

2.0 EVALUATION

The proposed changes include revising the Emergency Core Cooling System (ECCS) and Isolation Actuation Instrumentation channel functional test interval from monthly to quarterly. For instrumentation where the existing calibration interval is quarterly, the channel calibration now incorporates the channel functional test. The proposed quarterly test interval is in agreement with the approved GE topical reports and is acceptable to the staff.

A 6-hour surveillance test AOT for ECCS and isolation actuation instrumentation is also provided. For Hatch Units 1 and 2, the 6-hour test AOT has been included in the action statement. The proposed AOT is in agreement with the referenced topical reports. These changes are acceptable to the staff.

The licensee revised the action statement/LCO to incorporate a 12-hour AOT for ECCS and Isolation Actuation Instrument repair. The 12-hour AOT proposed by the licensee is in agreement with the GE topical reports. The staff finds the proposed 12-hour AOT for repair and the associated action statements to be acceptable.

The licensee also included a 2-hour AOT for Unit 1 Table 3.2-1 (Isolation Actuation Instrumentation) action statement/LCO for restoring of an inoperable channel (single channel per trip system) when tripping that channel would cause the trip function to occur. This is in agreement with the Hatch Unit 2 TS and STS. The proposed action statement is acceptable to staff.

The licensee revised Unit 1 TS Table 3.2-1 to include additional HPCI, RCIC, and LPCI isolation instrumentation that was previously listed on Unit 1 TS Tables 3.2-2, 3.2-3, and 3.2-5 (and corresponding surveillance Tables 4.2-2, 4.2-3, and 4.2-5). This change provides one uniform table for isolation actuation instrumentation and results in a more consistent application of the action statements/LCO. The proposed licensee revision to TS Table 3.2-1 is consistent with the STS and applicable GE topical reports. This change is acceptable to the staff.

The licensee also proposed test AOTs for instrument surveillance AOTs not specifically referenced in a topical report or the STS. The selected AOT is 6 hours and is consistent with the test AOTs specified for RPS, ECCS, and Isolation Actuation Instrumentation. The licensee did not propose any extension of the functional test surveillance interval or repair AOT for this instrumentation.

The licensee indicated that having to enter the actions statement for testing can restrict the time available to perform the surveillance and may result in implementation of the action statement. The addition of a test AOT for instrumentation not referenced in the STS and GE topical reports will allow consistency with the AOTs for both RPS, ECCS, Isolation Actuation, and related instrumentation. In some cases, the addition of a test AOT will limit the out-of-service time allowed for surveillance testing when compared to the current action statement/LCO. Additionally, the proposed instrumentation may be related to instrumentation covered in the topical report, may perform only monitoring functions, or is unique to the custom TS format. Based on the above, the staff finds the proposed changes acceptable as referenced in the licensee submittal.

The licensee proposed changes to the Reactor Protection System surveillance test AOT to 6 hours (Unit 1 Table 3.1-1). This change completes the RPS AOTs previously submitted by the licensee, is in agreement with the referenced topical reports, and is, therefore, acceptable to the staff. Additional editorial changes were also proposed for both units.

Technical Specification Amendments

As a result of the TS changes associated with the referenced GE topical reports and related instrumentation, the licensee proposed various amendments to the Hatch Units 1 and 2 TS. The staff finds the following changes acceptable.

Unit 1 Technical Specification Changes

Change 1: Table of Contents, Page i, Section 3.2, Protective Instrumentation, Item A. The description for Item 3.2-A is revised to "Isolation Actuation Instrumentation" to be more consistent with the Unit 2 TS. The description for Surveillance Section 4.2 is also revised accordingly.

Change 2: List of Tables, Pages vii, viii, Table 3.2-1. The title is revised to "Isolation Actuation Instrumentation" to be more consistent with the Unit 2 TS. Table 4.2-1 is revised to "Isolation Actuation Instrumentation Surveillance Requirements" to agree with Table 3.2-1.

Change 3: Table 3.1-1, Note (b), Page 3.1-6. "Reactor Protection System" is modified to include a surveillance AOT of 6 hours as Note/ACTION (b.2).

Change 4: Bases Section 4.1, Item A, Page 3.1-15. "Reactor Protection System" is revised to reflect the incorporation of the referenced GE topical reports and to be more consistent with the STS.

Change 5: Bases Sections, 4.1.A.2 and 4.1.A, Pages 3.1-16 and 3.1-17 is no longer applicable and is deleted.

Change 6: Bases Section 4.1.C, References, Page 3.1-18, is revised to include the referenced GE topical report. The graphical aid (Figure 4.1.1) for selection of an adequate interval between tests is no longer applicable and is deleted.

Change 7: Section 3.2, Page 3.2-1, Item A is revised to read "Initiates Isolation Actuation."

Change 8: Table 3.2-1, Page 3.2-2. The title is revised to match the Unit 2 TS and the STS, "Isolation Actuation Instrumentation."

- A. Revise action statement and remarks for Functional Unit 2, "Reactor Vessel Steam Dome Pressure (Shut-down cooling mode)."
- B. Revise required operable channels per trip system: from one to two for Functional Unit 16, "HPCI Turbine Exhaust Diaphragm Pressure" and Functional Unit 22, "RCIC Turbine Exhaust Diaphragm Pressure" (Pages 3.2-3a and 3b).
- C. Revise Note (c), Page 3.2-4 to be consistent with the ACTION in the Unit 2 TS/STS and to include a maintenance AOT of 12 hours. Note (c) is relabelled as (c.1) and a new note (c.2) is added to include a

surveillance AOT of 6 hours. Note (b) is relabelled as (b.1) and a new note (b.2) is added to include a surveillance AOT of 6 hours.

Change 9: Table 3.2-2, Pages 3.2-5, 3.2-6, and 3.2-7, "Instrumentation Which Initiates or Controls HPCI."

- A. Delete Functional Units 8 through 13. These Functional Units are transferred to Table 3.2-1 to provide consistent actions for Isolation Actuation Instrumentation.
- B. Revise note (b) to include a maintenance AOT of 12 hours and include a new note to provide a surveillance AOT of 6 hours. The notes are labelled (b.1) and (b.2), respectively.

Change 10: Table 3.2-3, Pages 3.2-8, 3.2-9, and 3.2-9a, "Instrumentation Which Initiates or Controls RCIC."

- A. Delete Functional Units 7 through 12. These Functional Units are transferred to Isolation Actuation Table 3.2-1 to provide consistent ACTIONS for isolation actuation instrumentation.
- B. Revise note (b) to include a maintenance AOT of 12 hours and include a new note to provide a surveillance AOT of 6 hours. The notes are labelled (b.1) and (b.2) respectively.

Change 11: Table 3.2-4, Page 3.2-10, "Instrumentation Which Initiates or Controls ADS." Revise note (b) to include a maintenance AOT time of 12 hours and include a new note providing a surveillance AOT of 6 hours. The notes are labelled (b.1) and (b.2), respectively.

Change 12: Table 3.2-5, Pages 3.2-11 and 3.2-13 "Instrumentation Which Initiates or Controls the LPCI Mode of RHR." Revise Functional Unit 3 "Reactor Vessel Steam Dome Pressure" to differentiate the functions for each instrument. Revise note (b) to include a maintenance AOT of 12 hours and include a new note providing a surveillance AOT of 6 hours. These notes are labelled (b.1) and (b.2), respectively.

Change 13: Table 3.2-6, Page 3.2-14, "Instrumentation Which Initiates or Controls Core Spray." Revise note (b) to include a maintenance AOT of 12 hours and include a new note providing a surveillance AOT of 6 hours. The notes are labelled (b.1) and (b.2), respectively.

Change 14: Table 3.2-7, Pages 3.2-16a and 3.2-17, "Neutron Monitoring Instrumentation Which Initiates Control Rod Blocks." Revise note (b) to include a surveillance AOT of 6 hours. The notes are labelled (b.1) and (b.2), respectively. Note (h) is added to specify that control rods are not permitted to be withdrawn during surveillance testing (scram discharge volume).

Change 15: Table 3.2-8, Page 3.2-19, "Radiation Monitoring Instrumentation Which Initiates Control Rod Blocks." Revise note (b) to include a

surveillance AOT of 6 hours. The notes are labelled (b.1) and (b.2), respectively.

Change 16: Table 3.2-9, Page 3.2-20, "Instrumentation which Initiates Recirculation Pump Trip." Revise note (b) to include a surveillance AOT of 6 hours. The notes are labelled (b.1) and (b.2), respectively. Revise note (f) to include a surveillance AOT of 6 hours. The notes are labelled (f.1) and (f.2), respectively.

Change 17: Table 3.2-10, Page 3.2-21, "Instrumentation Which Monitors Leakage into the Drywell." Revise note (b) to include a surveillance AOT of 6 hours. The notes are labelled (b.1) and (b.2), respectively.

Change 18: Table 3.2-11, Pages 3.2-23 and 3.2-23a, "Instrumentation Which Provides Surveillance Information." Add note (c.2), (e.2), and (f.2) to include a surveillance AOT of 6 hours. Label notes (c), (e), and (f) as (c.1), (e.1), and (f.1), respectively. Add note (g.2) to include a surveillance AOT of 6 hours. Revise note (g) to (g.1) and relabel items (1) and (2) as (a) and (b).

Change 19: Table 3.2-12, Page 3.2-23b, "Instrumentation Which Initiates the Disconnection of Offsite Power Sources." Add note (c.2) to include a surveillance AOT of 6 hours. Relabel note (c) as (c.1).

Change 20: Table 3.2-14, Page 3.2-23d, "Instrumentation Which ARMS Low Set S/RV System." Add note (b.2) to include a surveillance AOT of 6 hours. Relabel note (b) as (b.1).

Change 21: Table 4.2-1, Pages 3.2-24, 3.2-25, 3.2-25a, and 3.2-26; Rename title as "Isolation Actuation Instrumentation Surveillance Requirements" to be consistent with the Unit 2 TS and the STS.

- A. Revise from monthly to quarterly the channel functional test frequency for Functional Units referenced in the licensee submittal (Table 4.2-1, "Isolation Actuation Instrumentation Surveillance Requirements").
- B. Note (d) is no longer appropriate and is deleted.
- C. Revise the instrument channel check frequency for Functional Unit 12, "Drywell Radiation" from once per day to once per shift.
- D. Add Functional Units 13 through 24 as referenced in the licensee submittal. This change provides consistent actions for isolation actuation instrumentation.

Change 22: Table 4.2-2, Pages 3.2-27, 3.2-28, and 3.2-29, "Check, Functional Test, and Calibration Minimum Frequency for Instrumentation Which Initiates or Controls HPCI."

- A. Revise from monthly to quarterly the channel functional test frequency for the Functional Units referenced in the licensee submittal.

B. Delete Functional Units 8 through 13. This change provides consistent ACTIONS for Isolation Actuation Instrumentation.

C. Note (d) is no longer appropriate and is deleted.

Change 23: Table 4.2-3, Pages 3.2-30 and 3.2-31, "Check, Functional Test, and Calibration Minimum Frequency for Instrumentation Which Initiates or Control RCIC."

A. Revise from monthly to quarterly the channel functional test frequency for the Functional Units as referenced in the licensee submittal.

B. Delete Functional Units 7 through 12. This change provides consistent application of the ACTIONS for Isolation Actuation Instrumentation.

Change 24: Table 4.2-4, Page 3.2-33, "Check, Functional Test, and Calibration Minimum Frequency for Instrumentation Which Initiates or Controls ADS." Revise from monthly to quarterly the channel functional test frequency for the functional units referenced in the licensee submittal.

Change 25: Table 4.2-5, Page 3.2-35, "Check, Functional Test, and Calibration Minimum Frequency for Instrumentation Which Initiates or Controls the LPCI Mode of RHR." Revise the channel functional test frequency from monthly to quarterly for the functional units referenced it in the licensee submittal. Revise Functional Unit 3, "Reactor Vessel Steam Dome Pressure" to reflect the function of each instrument.

Change 26: Table 4.2-6, Page 3.2-38, "Check, Functional Test and Calibration Minimum Frequency for Instrumentation Which Initiates or Controls Core Spray." Revise the channel functional test frequency from monthly to quarterly for the Functional Units referenced in the licensee submittal.

Change 27: Table 4.2-7, Page 3.2-40, "Check, Functional Test, and Calibration Minimum Frequency for Neutron Monitoring Instrumentation Which Initiates Control Rod Blocks." Revise the channel functional test frequency from monthly to quarterly for Functional Unit (3.c), "APRM Downscale" as referenced in the licensee submittal.

Change 28: Table 4.2-8, Pages 3.2-42 and 3.2-43, "Check, Functional Test and Calibration Minimum Frequency for Radiation Monitoring Systems Which Limit Radioactivity Release." Revise the channel functional test frequency from monthly to quarterly for the Functional Units referenced in the licensee submittal. Also, note (e) is no longer appropriate and is deleted.

Change 29: Table 4.2-9, Page 3.2-45, "Check, and Calibration Minimum Frequency for Instrumentation Which Initiates Recirculation Pump Trip." Revise the channel functional test frequency from monthly to quarterly for the Functional Units referenced in the licensee submittal.

Change 30: Table 4.2-10, Pages 3.2-46 and 3.2-47, "Check, Functional Test, and Calibration Minimum Frequency for Instrumentation Which Monitors Leakage into the Drywell." Revise the channel functional test frequency to monthly

for the Functional Units referenced in the licensee's submittal. Note (e) is no longer appropriate and is deleted.

Change 31: Table 4.2-14, Page 3.2-49c, "Check, Functional Test, and Calibration Minimum Frequency for Instrumentation Which Arms the Low Low Set S/RV System." Revise the channel functional test frequency from monthly to quarterly for the Functional Units referenced in the licensee submittal.

Change 32: Pages 3.2-69, 3.2-70, and 3.2-71, "Bases for Limiting Conditions for Operation", Section 4.2, "Protective Instrumentation" is revised to reference the methodologies and related topical reports that form the bases for the surveillance and repair AOTs proposed by the licensee. Figure 4.2-1, "System Unavailability," is no longer required and is deleted.

Change 33: Page 3.2-50, "Bases for Limiting Conditions of Operation," Section 3.2, "Protection Instrumentation" is revised to reflect the incorporation of the GE topical report channel functional test frequencies and AOTs. Additional changes are included to reflect revisions to Tables 3.2-1, 3.2-2, 3.2-3, and 3.2-5. (Pages 3.2-52, -52a, -52b, -53, -54, -55, -56, -57, and -60)

Change 34: Section 4.5H, Page 3.5-11, "Maintenance of Filled Discharge Pipes," Item (4). The channel functional test requirements for the discharge piping level switches are revised from monthly to quarterly.

Change 35: Section 4.6.H.1, Pages 3.6-9 and 3.6-9a, "Operability of Tailpipe Pressure Switches" Item (e). Revise item (e) to include a 6-hour surveillance AOT and increase the channel functional test interval from 31 days to every 92 days.

Change 36: Section 4.6.H.2, Page 3.6-9a, "Relief Valves Low Set Function," Item (a). Revise the functional test interval from monthly to quarterly and include a surveillance AOT of 6 hours.

Change 37: Section 4.9.A.7, Page 3.9-4a, "Logic Systems," Item 3. Item 3 is covered elsewhere in the TS and is, therefore, deleted.

Change 38: Section 3.14.1, Page 3.14-1, ACTION (b), "Radioactive Liquid Effluent Instrumentation." Revise ACTION (b) to provide for a surveillance AOT of 6 hours as referenced in the licensee submittal.

Change 39: Table 3.14.2-1, Pages 3.14-9 and 3.14-10, ACTIONS 104, 105, 106, 107, and 108, "Radioactive Gaseous Effluent Monitoring Instrumentation." Revise the above ACTION statements to include a surveillance interval of 6 hours as referenced in the licensee submittal.

Unit 2 Technical Specification Change

Change 1: Section 3.1.3.5, Page 3/4 1-8, "Control Rod Scram Accumulators." The ACTION statement is revised to include a surveillance AOT of 6 hours as ACTION (c).

Change 2: Section 3.1.4.3, Page 3/4 1-17, "Rod Block Monitor." The applicable ACTIONS are revised to include a surveillance AOT of 6 hours as ACTION (c).

Change 3: Section 3.3.1, Pages 3/4 3-1, 3/4 3-5, and 3/4 3-5a, "Reactor Protection Instrumentation." ACTION (c) is replaced with an ACTION that includes a surveillance AOT of 6 hours. The present ACTION (c) is relabelled as ACTION (d). Editorial changes are also proposed for RPS surveillance requirements. Table 3.3.3-1 Note (a) is deleted as the surveillance AOT is now located within the ACTION statement.

Change 4: Section 3.3.2, Pages 3/4 3-9 and 3/4 3-9a, "Isolation Actuation Instrumentation." ACTION (b) is replaced with an ACTION statement that includes a maintenance AOT of 12 hours. ACTION (d) is revised to include a surveillance AOT of 6 hours. The present ACTION (d) is relabelled as ACTION (e).

Change 5: Table 3.3.2-1, Pages 3/4 3-15, 3/4 3-21, 3/4 3-22, and 3/4 3-23 "Isolation Actuation Instrumentation." Note (b) is deleted and relocated to the applicable actions. Table 4.3.2-1 channel functional test requirements are revised from monthly to quarterly as referenced in the licensee submittal. The channel check requirements for Functional Unit 1, Item (c) "Main Steam Line Radiation High," Item (g) "Drywell Radiation High," Functional Unit 2, Item (a) "Reactor Building Exhaust Radiation," and Item (d) "Refueling Floor Exhaust Radiation - High" and Functional Unit 3, Item (a) "Delta Flow High" are revised from once per day to once per shift.

Change 6: Section 3.3.3, Pages 3/4 3-24, 3/4 3-31, and 3/4 3-32, "Emergency Core Cooling System Actuation Instrumentation." Revise ACTION (b) to include a maintenance AOT of 12 hours. Replace ACTION (d) with an ACTION statement that includes a surveillance AOT of 6 hours. The existing ACTION (d) is relabelled as ACTION (e). Table 4.3.3-1 channel functional test requirements are revised from monthly to quarterly as referenced in the licensee submittal.

Change 7: Section 3.3.4, Pages 3/4 3-33, 3/4 3-34, and 3/4 3-36, "Reactor Core Isolation Cooling System Actuation Instrumentation." Revise ACTION (b) to include a maintenance AOT of 12 hours. A surveillance AOT of 6 hours is also provided as a new ACTION (d). Table 4.3.4-1, "Reactor Core Isolation Cooling System Actuation Instrumentation Surveillance Requirements," channel functional test requirements are revised from monthly to quarterly as referenced in the licensee submittal. An editorial change to note (a) is also included (Table 3.3.4-1).

Change 8: Section 3.3.5, Pages 3/4 3-37, 3/4 3-38, 3/4 3-39, and 3/4 3-41, "Control Rod Withdrawal Block Instrumentation." ACTION (c) is replaced with a new ACTION (c) that provides a surveillance AOT of 6 hours. The present ACTION (c) is relabelled as (d). Table 3.3.5-1, Pages 3/4 3-38 and 3/4 3-39, "Control Rod Withdrawal Block Instrumentation" is revised to include note (g) which prohibits rod withdrawal during channel functional testing/channel calibration (scram discharge volume). Table 4.3.5-1 functional test requirement for APRM downscale is revised from monthly to quarterly as referenced in the licensee submittal.

Change 9: Section 3.3.6.1, Page 3/4 3-43, "Radiation Monitoring Instrumentation." ACTION (c) is revised to include a surveillance AOT of 6 hours. The existing ACTION (c) is relabelled as (d).

Change 10: 3.3.6.2, Page 3/4 3-47, "Seismic Monitoring Instrumentation." ACTION (b) is revised to include a surveillance AOT of 6 hours. The existing ACTION (b) is relabelled as (c).

Change 11: Section 3.3.6.3, Page 3/4 3-50, "Remote Shutdown Monitoring Instrumentation." ACTION (b) is revised to include a surveillance AOT of 6 hours. The existing ACTION (b) is relabelled as (c).

Change 12: Section 3.3.6.4, Pages 3/4 3-53 and 3/4 3-54, "Post-Accident Monitoring Instrumentation." ACTION (b) is revised to include a surveillance AOT of 6 hours. The existing ACTION (b) is relabelled as (c). An editorial change to Table 3.3.6.4-1 is also included.

Change 13: Section 3.3.6.5, Pages 3/4 3-56 and 3/4 3-56a, "Source Range Monitors." Add ACTION (c) to provide for a surveillance AOT of 6 hours.

Change 14: Section 3.3.6.7, Pages 3/4 5-58, 3/4 5-58b and 3/4 5-58d, "Main Control Room Environmental Control System (MCRECS) Actuation Instrumentation." Add ACTION (b) to provide a surveillance AOT of 6 hours. With the surveillance AOTs moved to the action statement note (a) to Table 3.3.6.7-1 is no longer required and is deleted. Revise note (b) to Table 3.3.6.7-1 to provide a maintenance AOT of 12 hours. Table 4.3.6.7-1 channel functional test requirements are revised from monthly to quarterly as referenced in the licensee submittal.

Change 15: Section 3.3.6.9, Page 3/4 3-60a, "Radioactive Liquid Effluent Instrumentation." ACTION (c) is revised to include a surveillance AOT of 6 hours. The existing ACTION (c) is relabelled as (d).

Change 16: Section 3.3.6.10, Page 3/4 3-60f, "Radioactive Gaseous Effluent Instrumentation." ACTION (c) is revised to include a surveillance AOT of 6 hours. The existing ACTION (c) is relabelled (d).

Change 17: Section 3.3.8, Page 3/4 3-63, Degraded Station Voltage Protection Instrumentation." Add an ACTION (b) to provide a surveillance AOT of 6 hours.

Change 18: Section 3.3.9.1, Pages 3/4 3-66, 3/4 3-66a, and 3/4 3-69, "Recirculation Pump Trip Actuation Instrumentation, ATWS Recirculation Pump Trip System Instrumentation." Revise ACTIONS (b) and (c.1) to provide a maintenance AOT of 12 hours. Add a new ACTION (f) that provides a surveillance AOT of 6 hours. Table 4.3.9.1-1 channel functional test requirements are revised from monthly to quarterly as referenced by the licensee submittal.

Change 19: Section 3.3.9.2, Pages 3/4 3-70, 3/4 3-72, and 3/4 3-75, "End-Of-Cycle Recirculation Pump Trip System Instrumentation." Revise ACTIONS (b) and (c.1) to provide a maintenance AOT of 12 hours. Add a new ACTION (f) that provides a surveillance AOT of 6 hours. Table 3.3.9.2-1 note (a) which

provides for a 2 hour surveillance AOT is deleted. Table 4.3.9.2.1-1 functional test requirements are revised from monthly to quarterly as referenced in the licensee submittal.

Change 20: Section 3.4.2.1, Page 3/4 4-4, "Safety/Relief Valves." Add a new ACTION (g) that provides a surveillance AOT of 6 hours. Revise Section 4.4.2.1, (tail pipe pressure switches) channel functional test requirements from monthly to quarterly for functional unit (a) Items 1 and 2.

Change 21: Section 3.4.2.2, Page 3/4 4-4a, "Safety/Relief Valves Low-Low Set Function." Add a new ACTION (c) that provides a surveillance AOT of 6 hours. Revise Section 4.4.2.2 (low-low set relief valve) channel functional test requirements from monthly to quarterly as referenced in the licensee submittal.

Change 22: Section 3.4.3.1, Page 3/4 4-5, "Reactor Coolant System Leakage." Add a new ACTION (d) that provides a surveillance AOT of 6 hours.

Change 23: Section 3.5.3.1, Page 3/4 5-4, "Low Pressure Core Cooling Systems." Add a new ACTION (3) that provides a surveillance AOT of 6 hours.

Change 24: Section 3.5.4, Page 3/4 5-10, "Suppression Chamber." Add a new ACTION (e) that provides a surveillance AOT of 6 hours.

Change 25: Section 3.6.2.1, Page 3/4 6-12, "Depressurization Systems Suppression Chamber." Add a new ACTION (h) that provides a surveillance AOT of 6 hours.

Change 26: Section 3.9.2, Page 3/4 9-3, "Refueling Operations Instrumentation." Add a new ACTION (b) that provides a surveillance AOT of 6 hours.

Change 27: Section 3/4.3.1, Page B 3/4 3-1, "Bases, Reactor Protection System Instrumentation." Editorial changes are proposed for the Bases section allowing for the maintenance and surveillance AOTs as referenced in the licensee submittal.

In general, the Standard Technical Specifications (STS) allow a channel/instrument to be inoperable for a short period of time in order to perform surveillance testing. This may be accomplished by a test AOT or an appropriate action statement/LCO. The existing Hatch Units 1 and 2 TS do not provide complete allowable out-of-service times for the testing of ECCS or Isolation Actuation Instrumentation. To improve the AOT consistency between both units, the licensee proposed the addition of surveillance AOTs for the affected instrumentation in each unit. Additionally, the licensee elected to incorporate TS AOT revisions as approved by the referenced General Electric (GE) Topical reports. These topical reports include extended AOTs for both repair and testing and the adoption of quarterly surveillance intervals for RPS, ECCS, Isolation Actuation Instrumentation, and additional related instrumentation. The TS revisions proposed by the licensee are consistent with the GE topical reports and are acceptable to the staff.

The licensee also proposed test AOTs for instrumentation not specifically referenced in the GE topical reports or the STS. The staff reviewed the action statements associated with these changes and determined that the incorporation of a test AOT provides an adequate amount of time to perform the surveillance. The addition of AOTs for this instrumentation also provides consistency with associated ECCS, RPS, and Isolation Actuation Instrumentation and generally limits the out-of-service time for surveillance testing.

The staff also expressed concern that the model TS ACTION could be interpreted to permit a loss of functional capability for the extended AOT repair interval specified in the GE topical reports (12 hours). The owners group and GE agreed with the staff that the assumptions of the topical report analysis (NEDC-30851P-A) did not support the model TS Action.

However, the licensee, by letter dated February 17, 1993, committed to implement formal administrative controls to ensure that operation with a loss of trip, isolation, or actuation instrumentation functional capability is not permitted during a 12-hour allowed out-of-service time (AOT for repair). The proposed administrative controls also commit to take corrective actions within 1 hour should such a condition be discovered. Additionally, Hatch Unit 2 is the lead plant for conversion to the Improved Standard Technical Specifications. Once implemented at Hatch, the ISTS will resolve the TS loss of function issue for extended AOTs for both units. Based on the above, the staff finds the implementation of administrative controls to control the extended repair AOTs included with the referenced GE topical reports to be acceptable.

Based on our review, the staff finds the proposed amendments to incorporate revised AOTs, based on the referenced GE topical reports, STS referenced AOTs, and additional surveillance test AOTs to be acceptable.

3.0 STATE CONSULTATION

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

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of facility components located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The NRC 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 (57 FR 13131 dated April 15, 1992). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

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

Principal Contributor: C. Douth

Date: April 30, 1993

References

1. NEDC-31677P-A, "Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation" dated July 1990.
2. NEDC-30936P-A, "BWR Owners' Group Technical Specification Improvement Methodology (With Demonstration for BWR ECCS Actuation Instrumentation) Part 1," dated December 1988.
3. NEDC-30936P-A, "BWR Owners' Group Technical Specification Improvement Methodology (With Demonstration for BWR ECCS Actuation Instrumentation)," Part 2, dated December 1988.
4. NEDC-30851P-A, "Technical Specification Improvement Analyses for BWR Reactor Protection System," dated March 1988.
5. NEDC-30851P-A, Supplement 1, "Technical Specification Improvement Analyses for BWR Control Rod Block Instrumentation," dated October 1988.
6. NEDC-30851P-A, Supplement 2, "Technical Specification Improvement Analyses for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," dated March 1989.
7. GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-Of-Service Times for Selected Instrumentation Technical Specifications," dated February 1991.
8. GENE-770-06-2, "Addendum to Bases for Changes to Surveillance Test Intervals and Allowed Out-Of-Service Times for Selected Instrumentation Technical Specifications." (BWR RCIC Instrumentation), dated February 1991.
9. Letter, dated July 26, 1991, from C. E. Rossi (NRC) to G. J. Beck (BWROG), "BWR owners group (BWROG) topical reports on Technical Specification improvement analysis for BWR reactor protection systems - use for relay and solid state plants (NEDC-30884 and NEDC-30852P)."
10. Letter, dated November 4, 1992, from C. L. Tully (BWROG) to Brian K. Grimes (NRC), "BWR owners group (BWROG) topical reports on Technical Specification improvement analysis for BWR reactor protection systems - use for relay and solid state plants (NEDC-30884 and NEDC-30852P)."