

September 17, 1991

Mr. W. G. Hairston, III
Senior Vice President -
Nuclear Operations
P. O. Box 1395
Birmingham, Alabama 35201

Dear Mr. Hairston:

SUBJECT: HATCH UNIT 2 - REQUEST TO REVISE TECHNICAL SPECIFICATION
3.3.6.6 ON TRAVERSING INCORE PROBE OPERABILITY REQUIREMENTS
(TAC NO. 81559)

The Commission has forwarded the enclosed "Notice of Consideration of Issuance of Amendment to Facility Operating License, Proposed No Significant Hazards Consideration Determination, and Opportunity for Hearing" to the Office of the Federal Register for publication.

This notice relates to your September 13, 1991, application to change the Hatch Unit 2 Technical Specification 3.3.6.6 on the Traversing Incore Probe Operability Requirements.

Sincerely,

ORIGINAL SIGNED BY:

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

Enclosure:
As stated

cc w/enclosure:
See next page

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

September 17, 1991

Docket No. 50-366

Mr. W. G. Hairston, III
Senior Vice President -
Nuclear Operations
P. O. Box 1395
Birmingham, Alabama 35201

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Sincerely,

A handwritten signature in cursive script that reads "Kahtan N. Jabbour".

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

Enclosure:
As stated

cc w/enclosure:
See next page

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UNITED STATES NUCLEAR REGULATORY COMMISSION

GEORGIA POWER COMPANY, ET AL.

DOCKET NO. 50-366

NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENT TO
FACILITY OPERATING LICENSE, PROPOSED NO SIGNIFICANT HAZARDS
CONSIDERATION DETERMINATION, AND OPPORTUNITY FOR HEARING

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an amendment to Facility Operating License No. NPF-5, issued to Georgia Power Company, et al. (the licensee), for operation of the Edwin I. Hatch Nuclear Plant, Unit 2 located in Appling County, Georgia.

The proposed amendment would involve a change to Hatch Unit 2 Technical Specification (TS) 3.3.6.6 for the Traversing Incore Probe (TIP) system. Specifically, the proposed change would require that three detectors be operable as opposed to the four required under TS 3.3.6.6. Also, Item c. of the applicability section is being deleted because the TIP system is no longer used to adjust the Average Power Range Monitor (APRM) setpoints.

The licensee stated that on September 8, 1991, during performance of rod maneuvers for the purpose of exchanging control rod sequences, it was discovered that the Hatch Unit 2 "C" TIP machine would not index properly due to a problem apparently associated with the indexing mechanism. Correcting the problem requires access to the primary containment (drywell). However, with Unit 2 operating at 100% power, access is not possible at this time. The present TS requires four operable TIP machines for recalibration of the Local Power Range Monitor (LPRM) detectors every 31 Effective Full Power Days (EFPD). Performance of a core map within this period of time is necessary to

maintain the validity and accuracy of the Periodic Core Performance Log (P1). P1 is the process computer program which calculates the Minimum Critical Power Ratio (MCPR), Linear Heat Generation Rate (LHGR) and Average Planar Linear Heat Generation Rate (APLHGR). Inability to determine compliance with these thermal limits per TSs 3.2.1, 3.2.3, and 3.2.4 would require reducing core thermal power to less than 25%.

The Commission has made a proposed determination that the amendment request involves no significant hazards consideration. Under the Commission's regulations in 10 CFR 50.92, this means that operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an 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. As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The TIP system is not used to mitigate the consequences of or prevent any accident, nor are assumptions made in any accident analysis relative to the operation of the TIP system. Implementation of this proposed change will not change the function of any plant systems needed to prevent or mitigate the consequences of postulated accidents. Therefore, reducing the number of required Operable TIP machines from four to three and using substitute TIP traces for the calibration of LPRMs and the monitoring of thermal limits does not increase the probability of occurrence of a previously evaluated accident.

The change in power distribution determination in the process computer does not affect the consequences of anticipated operational occurrences (transients) described in the FSAR since the MCPR safety limit is not violated during the events. Provided the control rods are positioned in an "A" sequence and the total core TIP uncertainty for the cycle is less than or equal to 8.7%, neither the MCPR operating

limit nor the safety limit need to be increased. The 8.7% uncertainty factor is the number used in the MCPR safety limit analysis (NEDE-24011-P-A-10, ["General Electric Standard Application for Reactor Fuel," February, 1991]). The current total core TIP uncertainty has been determined to be 8.1%, which does not exceed the 8.7% requirement.

Hatch Unit 2 has been operating in the octant symmetric "A" sequence since the beginning of the cycle. To provide an assessment of operating with the "C" TIP machine out of service, a simulation was performed to calculate the [e]ffect on thermal limits if a state point obtained before the inoperability of the "C" TIP was recalculated using the symmetric pairs in place of the "C" machine locations. The results of this simulation [shown elsewhere in the licensee's submittal dated September 13, 1991], indicate that the core is operating in a highly symmetric manner and that use of the substitute TIP readings will have a minimal affect on thermal limit calculations. Hatch Unit 2 will continue to be operated in the "A" sequence for the duration of the "C" TIP outage. Plant procedures will be revised to reflect this.

Therefore, since the total core TIP uncertainty is acceptable and operation of Hatch Unit 2 will continue in the "A" sequence throughout the duration of the "C" TIP outage, reducing the number of required Operable TIP machines from four to three does not decrease the margin of safety to the MCPR operating and safety limits and the radiological dose consequences for previously analyzed accidents are not increased.

The proposed change which removes the reference to the APRM setpoint is an administrative change. It reflects the fact that we [the licensee] no longer adjust the APRM trip or the APRM gain for high peaking factors. This change was made in 1984 and was done as part of the APRM/RBM [Rod Block Monitor] Technical Specification (ARTS) improvement program. Since neither plant operation nor equipment is being affected, this change does not increase the probability of occurrence of the consequences of a previously evaluated accident.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Using substitute TIP traces and changing the Hatch 2 Technical Specifications such that the TIP system is operable with three movable detectors does not change the basic operation of the plant. Nor does it change the operation of any safety related plant equipment.

Although the Process Computer will be operating differently in the calculation of core thermal limits, the difference only involves the assignment of incoming data to various arrays for the calculation of nodal powers, thermal limits, etc. Furthermore, the process computer is

not required for the safe shutdown of the plant nor is it used for the mitigation of consequences of accidents. Therefore, changing this Technical Specification such that the TIP system is operable with three TIP machines does not increase the likelihood of an accident occurring different from any analyzed in the FSAR.

The proposed change removing the reference to APRM setpoint adjustment is administrative in nature, reflecting how the plant is actually operated. No changes to plant equipment or operation result from it, therefore, the probability of any accident occurring is not increased.

3. The proposed amendment does not result in a significant reduction in the margin of safety.

The margin of safety for some of the accidents analyzed in the FSAR is the Technical Specification fuel cladding integrity (MCPR) safety limit. This safety limit ensures that at least 99.9% of the fuel rods in the core will avoid transition boiling during an anticipated operational occurrence (transient). As documented in General Electric Generic Licensing Topical Report, GESTAR-II, the MCPR safety limit is based, in part, on a statistical combination of uncertainties in key parameters, including total core TIP uncertainty. As long as the total uncertainty is less than or equal to what was used to calculate the original MCPR safety limit (8.7%), the margin of safety is unchanged. Substitute TIP traces can be used to monitor thermal limits and calibrate LPRMs only if the core is loaded symmetrically and is operating with a symmetric, "A" sequence rod pattern.

The margin of safety is not reduced as a result of using this method because we [the licensee] have shown that the total core TIP uncertainty is less than 8.7% of the Hatch Unit 2 core is being operated in the "A" rod sequence. Unit 2 will continue to be operated in the "A" rod sequence at least until the return of the "C" TIP machine to service. Plant procedures will be revised to reflect this.

The proposed change to eliminate reference to the APRM setpoint adjustment is administrative in nature. No changes to plant equipment or plant operation results, thus the margin of safety is not reduced.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

The Commission is seeking public comments on this proposed determination. Any comments received within fifteen (15) days after the date of publication of this notice will be considered in making any final determination. The Commission will not normally make a final determination unless it receives a request for a hearing.

Written comments may be submitted by mail to the Regulatory Publications Branch, Division of Freedom of Information and Publications Services, Office of Administration, U.S. Nuclear Regulatory Commission, Washington, DC 20555, and should cite the publication date and page number of this FEDERAL REGISTER notice. Written comments may also be delivered to Room P-223, Phillips Building, 7920 Norfolk Avenue, Bethesda, Maryland, from 7:30 a.m. to 4:15 p.m. Copies of written comments received may be examined at the NRC Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, DC 20555. The filing of requests for hearing and petitions for leave to intervene is discussed below.

By October 24, 1991, the licensee may file a request for a hearing with respect to issuance of the amendment to the subject facility operating license and any person whose interest may be affected by this proceeding and who wishes to participate as a party in the proceeding must file a written request for a hearing and a petition for leave to intervene. Requests for a hearing and a petition for leave to intervene shall be filed in accordance with the Commission's "Rules of Practice for Domestic Licensing Proceedings" in 10 CFR Part 2. Interested persons should consult a current copy of 10 CFR 2.714 which is available at the Commission's Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, DC 20555 and at the local public document room located at Appling County Public Library, 301 City Hall Drive, Baxley, Georgia 31513.

If a request for a hearing or petition for leave to intervene is filed by the above date, the Commission or an Atomic Safety and Licensing Board, designated by the Commission or by the Chairman of the Atomic Safety and Licensing Board Panel, will rule on the request and/or petition; and the Secretary or the designated Atomic Safety and Licensing Board will issue a notice of hearing or an appropriate order.

As required by 10 CFR 2.714, a petition for leave to intervene shall set forth with particularity the interest of the petitioner in the proceeding, and how that interest may be affected by the results of the proceeding. The petition should specifically explain the reasons why intervention should be permitted with particular reference to the following factors: (1) the nature of the petitioner's right under the Act to be made a party to the proceeding; (2) the nature and extent of the petitioner's property, financial, or other interest in the proceeding; and (3) the possible effect of any order which may be entered in the proceeding on the petitioner's interest. The petition should also identify the specific aspect(s) of the subject matter of the proceeding as to which petitioner wishes to intervene. Any person who has filed a petition for leave to intervene or who has been admitted as a party may amend the petition without requesting leave of the Board up to fifteen (15) days prior to the first prehearing conference scheduled in the proceeding, but such an amended petition must satisfy the specificity requirements described above.

Not later than fifteen (15) days prior to the first prehearing conference scheduled in the proceeding, a petitioner shall file a supplement to the petition to intervene which must include a list of the contentions which are sought to be litigated in the matter. Each contention must consist of a specific statement of the issue of law or fact to be raised or controverted. In addition, the petitioner shall provide a brief explanation of the bases of the contention and a concise statement of the alleged facts or expert opinion which support the contention and on which the petitioner intends to rely in proving the contention at the hearing. The petitioner must also provide references to those specific sources and documents of which the petitioner is aware and on which the petitioner intends to rely to establish those facts or expert opinion. Petitioner must provide sufficient information to show that a genuine dispute exists with the applicant on a material issue of law or fact. Contentions shall be limited to matters within the scope of the amendment under consideration. The contention must be one which, if proven, would entitle the petitioner to relief. A petitioner who fails to file such a supplement which satisfies these requirements with respect to at least one contention will not be permitted to participate as a party.

Those permitted to intervene become parties to the proceeding, subject to any limitations in the order granting leave to intervene, and have the opportunity to participate fully in the conduct of the hearing, including the opportunity to present evidence and cross-examine witnesses.

If the amendment is issued before the expiration of 30-days, the Commission will make a final determination on the issue of no significant hazards consideration. If a hearing is requested, the final determination will serve to decide when the hearing is held.

If the final determination is that the amendment request involves no significant hazards consideration, the Commission may issue the amendment and make it immediately effective, notwithstanding the request for a hearing. Any hearing held would take place after issuance of the amendment.

If the final determination is that the amendment request involves a significant hazards consideration, any hearing held would take place before the issuance of any amendment.

Normally, the Commission will not issue the amendment until the expiration of the 15-day notice period. However, should circumstances change during the notice period, such that failure to act in a timely way would result, for example, in derating or shutdown of the facility, the Commission may issue the license amendment before the expiration of the 15-day notice period, provided that its final determination is that the amendment involves no significant hazards consideration. The final determination will consider all public and State comments received. Should the Commission take this action, it will publish in the FEDERAL REGISTER a notice of issuance. The Commission expects that the need to take this action will occur very infrequently.

A request for a hearing or a petition for leave to intervene must be filed with the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, DC 20555, Attention: Docketing and Services Branch, or may be delivered to the Commission's Public Document Room, the Gelman Building, 2120 L Street, N.W., Washington, DC 20555, by the above date. Where petitions are filed

during the last ten (10) days of the notice period, it is requested that the petitioner promptly so inform the Commission by a toll-free telephone call to Western Union at 1-(800) 325-6000 (in Missouri 1-(800) 342-6700). The Western Union operator should be given Datagram Identification Number 3737 and the following message addressed to David B. Matthews: petitioner's name and telephone number; date petition was mailed; plant name; and publication date and page number of this FEDERAL REGISTER notice. A copy of the petition should also be sent to the Office of the General Counsel, U.S. Nuclear Regulatory Commission, Washington, DC 20555, and to Bruce W. Churchill, Esquire, Shaw, Pittman, and Trowbridge, 2300 N Street, NW., Washington, DC 20037 attorney for the licensee.

Nontimely filings of petitions for leave to intervene, amended petitions, supplemental petitions and/or requests for hearing will not be entertained absent a determination by the Commission, the presiding officer or the presiding Atomic Safety and Licensing Board that the petition and/or request should be granted based upon a balancing of the factors specified in 10 CFR 2.714(a)(1)(i)-(v) and 2.714(d).

For further details with respect to this action, see the application for amendment dated September 13, 1991, which is available for public inspection at the Commission's Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, DC 20555, and at the local public document room, located at Appling County Public Library, 301 City Hall Drive, Baxley, Georgia 31513.

Dated at Rockville, Maryland, this 17th day of September 1991.

FOR THE NUCLEAR REGULATORY COMMISSION

Kahtan N. Jabbour

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