

August 22, 1984

DMB o/b

Docket No. 50-366

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 Amendment No. 40 to Facility Operating License No. NPF-5 for the Edwin I. Hatch Nuclear Plant, Unit No. 2. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated August 6, 1984, as supplemented August 10, 14 and 16, 1984.

The amendment revises the TSs for containment isolation signals to 10 valves in the core spray and RHR systems. These valves are normally closed and receive a verification signal to close upon LPCI and core spray system actuation. The TS change was necessitated due to differences found between the as-built containment isolation signal, triple low reactor vessel water level, which was correct, and the erroneous value found in the Technical Specifications (low reactor vessel water level). The change requires that all the valves in question isolate on the triple low level.

This TS change evaluation is being performed on an emergency basis in order to preclude an unnecessary delay in plant startup from the current outage. Technical Specification 3.6.3 (Primary Containment Isolation Valves) would permit plant restart with the containment isolation function of the valves in question declared inoperable so long as they were closed and deactivated. This action, however, would disable both trains of the safety-related suppression pool cooling system. Technical Specification 3.2.6 (Suppression Pool Cooling) requires both trains of suppression pool cooling to be operable for plant startup. The current Technical Specification 3.6.3, which allows startup and continued operation with these containment isolation valves deactivated, was intended to be applicable to containment isolation valves in general and does not reflect the importance of an individual valve's functions. Accordingly, you are requested to perform a full review of the function of all containment isolation valves and provide changes to your Technical Specifications, as appropriate, to correct potential sources of confusion.

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Mr. J. T. Beckham, Jr.

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A copy of the Safety Evaluation is also enclosed. Notice of Issuance and Final Determination of No Significant Hazards Consideration and Opportunity for Hearing will be included in the Commission's next monthly Federal Register notice.

Sincerely,

"ORIGINAL SIGNED BY
JOHN F. STOLZ"

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

Enclosures:
Amendment No. 40
Safety Evaluation

cc w/enclosures:
See next page

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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. 50-366
EDWIN I. HATCH NUCLEAR PLANT, UNIT NO. 2
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 40
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 August 6, 1984, as supplemented August 10, 14, and 16, 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:

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Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 40, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as 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 22, 1984

ATTACHMENT TO LICENSE AMENDMENT NO. 40

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. The corresponding overleaf pages are also provided to maintain document completeness.

Remove

3/4 6-18

3/4 6-22

Insert

3/4 6-18

3/4 6-22

TABLE 3.6.3-1

PRIMARY CONTAINMENT ISOLATION VALVES

<u>VALVE FUNCTION AND NUMBER</u>	<u>VALVE GROUP</u> ^(a)	<u>ISOLATION TIME</u> (Seconds)
A. <u>Automatic Isolation Valves</u>		
1. Main Steam Isolation Valves		
2B21-F022 A, B, C and D	1	$3 < t < 5$
2B21-F028 A, B, C and D	1	$3 < t < 5$
2. Main Steam Drain Isolation Valves		
2B21-F016	1	15
2B21-F019	1	15
3. Reactor Water Sample Line Isolation Valves		
2B31-F019	1	5
2B31-F020	1	5
4. Drywell Equipment Drain Sump Discharge Isolation Valves		
2G11-F019	2	20
2G11-F020	2	20
5. Drywell Floor Drain Sump Discharge Isolation Valves		
2G11-F003	2	20
2G11-F004	2	20

^(a) See Specification 3.3.2, Table 3.3.2-1, for isolation signals that operate each valve group.

TABLE 3.6.3-1 (Continued)

PRIMARY CONTAINMENT ISOLATION VALVES

<u>VALVE FUNCTION AND NUMBER</u>	<u>VALVE GROUP (a)</u>	<u>ISOLATION TIME (Seconds)</u>
A. <u>Automatic Isolation Valves (Continued)</u>		
6. Containment Spray Isolation Valves		
2E11-F016 A(b) and B(b)	*	10
2E11-F028 A(b) and B(b)	*	24
7. RHR Heat Exchanger Drain Isolation Valves		
2E11-F011 A and B	*	20
2E11-F026 A and B	*	20
8. Drywell-to-Torus Differential Pressure System Isolation Valves		
2F48-F209	12	5
2F48-F210	12	5
2F48-F211	12	5
2F48-F212	12	5
9. HPCI Steam Line Isolation Valves		
2E41-F002	3	50
2E41-F003	3	50

(a) See Specification 3.3.2, Table 3.3.2-1, for isolation signals that operate each valve group
 (b) May be opened on an intermittent basis under administrative control

*Closes upon actuation of the LPCI mode of RHR via a high drywell pressure signal (see item 2.a of Table 3.3.3-1) or a Low Low Low (Level 1) signal from 2B21-N691A,B,C,D (see item 2.b of Table 3.3.3-1).

ENCH-UNIT 2

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Amendment No. 40

HATCH - UNIT 2

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TABLE 3.6.3-1 (Continued)
PRIMARY CONTAINMENT ISOLATION VALVES

<u>VALVE FUNCTION AND NUMBER</u>	<u>VALVE GROUP</u> ^(a)	<u>ISOLATION TIME</u> <u>(Seconds)</u>
A. <u>Automatic Isolation Valves (Continued)</u>		
17. Torus Cleanup Vacuum Drag Isolation Valves		
2G51-F011	7	15
2G51-F012	7	15
18. HPCI Turbine Exhaust Vacuum Breaker Isolation Valves		
2E41-F111	8	15
2E41-F104	8	15
19. RCIC Turbine Exhaust Vacuum Breaker Isolation Valves		
2E51-F104	9	15
2E51-F105	9	15
20. H₂O₂ Sampling System Isolation Valves		
2P33-F004	10	5
2P33-F012	10	5
2P33-F002	10	5
2P33-F010	10	5
2P33-F006	10	5
2P33-F007	10	5
2P33-F014	10	5
2P33-F015	10	5
2P33-F003	10	5
2P33-F011	10	5
2P33-F005	10	5
2P33-F013	10	5

^(a) See Specification 3.3.2, Table 3.3.2.1, for isolation signals that operate each valve group.

TABLE 3.6.3-1 (Continued)

<u>VALVE FUNCTION AND NUMBER</u>	<u>PRIMARY CONTAINMENT ISOLATION VALVES</u>	<u>VALVE GROUP (a)</u>	<u>ISOLATION TIME (Seconds)</u>
A. Automatic Isolation Valves (Continued)			
21. Core Spray System Flow Test Line Isolation Valves			
2E21-F015 A	*		50
2E21-F015 B	*		50
22. Suppression Pool Vent and Surge System Isolation Valves			
2T48-F338	10		5
2T48-F339	10		5
2T48-F318	10		5
2T48-F326	10		5
23. RHR Shutdown Cooling Suction Isolation Valves			
2E11-F008	11		24
24. RPV Head Spray Isolation Valve			
2E11-F023	11		20

(a) See Specification 3.3.2, Table 3.3.2-1, for isolation signals that operate each valve group
 *Closes upon actuation of Core Spray via a high drywell pressure signal (see item 1.b of Table 3.3.3-1) or a Low Low Low (Level 1) signal from 2B21-N691A,B,C,D (see item 1.a of Table 3.3.3-1).



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 40 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, UNIT NO. 2

DOCKET NO. 50-366

1.0 Introduction

On May 4, 1984, the licensee discovered a discrepancy between containment isolation valve actuation setpoints specified in the technical specifications and the installed actuation setpoints. The discrepancy was identified for 10 containment isolation valves in the RHR and core spray systems.

The valves and their respective systems are:

2E11-F011 A, B	RHR Heat Exchanger Drain Isolation Valves
2E11-F026 A, B	RHR Heat Exchanger Drain Isolation Valves
2E11-F016 A, B	Drywell Spray Isolation Valves
2E11-F028 A, B	Torus Spray/Suppression Pool Cooling Isolation Valves
2E21-F015 A, B	Core Spray Full Flow Test Line Isolation Valves

Each of these valves are normally closed and receive automatic confirmatory isolation signals to close. The technical specifications list each of these valves as receiving a Group 2 isolation signal. Group 2 isolation signals are actuated by either high drywell pressure or low reactor vessel water level. However, the as-built auto-closure setpoint for these valves was discovered to be either a high drywell pressure or a low-low-low reactor vessel water level.

Hatch Unit 2 is currently completing a refueling outage and is scheduled for plant restart on August 22, 1984. Upon identifying the discrepancy between the technical specifications and the as-built plant, the licensee declared the 10 isolation valves to be inoperable. Technical Specification 3.6.3 (Primary Containment Isolation Valves) would permit plant restart with the isolation valves in question declared inoperable as long as they were closed and deactivated. This action, however, would prevent both trains of the RHR system from operating in the safety-related suppression pool cooling mode. Technical Specification 3.6.2 (Suppression Pool Cooling) requires both trains of suppression pool cooling to be operable for plant startup. The current Technical Specification 3.6.3, which allows startup and continued operation with these containment isolation valves deactivated, was intended to be applicable to the containment isolation valves in general and does not reflect the importance of an individual valve's

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The Georgia Power Company's letters of August 6, 10, 14 and 16, 1984, requested a change to Technical Specification 3.6.3 which would result in the valves being returned to operable status and permit plant restart. Specifically, the licensee requested that the Technical Specifications be revised to identify the 10 valves in question as isolating upon either a high drywell pressure signal or a triple low reactor vessel level signal. This is the current as-built configuration. The licensee has concluded that the proposed change is primarily administrative and that it is consistent with the FSAR and the original engineering safety analysis.

2.0 EVALUATION

The licensee's basis for the proposed changes include:

1. The ECCS analysis is unaffected by the proposed changes. This is because the auto-closure verification signal assumed in both the FSAR and the architectural engineer's design analysis remains unchanged at the triple low level signal.
2. FSAR LOCA analyses show that, for a spectrum of postulated break sizes, containment isolation and ECCS actuation will be activated by a high drywell pressure signal before either a low or triple low reactor vessel water level signal is actuated. Therefore, the containment isolation function remains unchanged.
3. The proposed technical specification change is consistent with corresponding isolation signals of other recently licensed BWR facilities.

The proposed Technical Specification changes do not result in a hardware change but rather an administrative change so that the Technical Specification will reflect both the analyzed and as-built plant design. The staff's former analysis was on the basis of the actual configuration of the plant, and not the words of the Technical Specifications which are here changed.

We concur with the licensee's conclusion in that the proposed changes will not affect the ECCS performance or the isolation function. All 10 of the valves in question are normally closed and receive a verification signal to close at the same time as LPCI and core spray system actuation.

The licensee has examined other containment isolation valves receiving a Group 2 isolation signal and has verified that all affected valves have been identified.

With regard to the safety significance of isolating on a low versus triple low reactor vessel water level, the staff concludes that this is insignificant. The staff has accepted both low and triple low reactor vessel water level signals as isolation signals for corresponding valves on recently licensed BWR facilities. In addition, as pointed out by the licensee, high drywell pressure (2.0 psig) is predicted to occur prior to either of the water level setpoints.

Emergency Circumstances

GPC (the licensee's) plant personnel identified on May 4, 1984 an apparent discrepancy between the installed actuation setpoints for the 10 valves in question and the actuation setpoints referenced in the Technical Specifications. GPC requested its Architect/Engineer (A/E) to investigate and evaluate this identified discrepancy. On August 2, 1984, GPC received its A/E report which resulted in the licensee submitting its emergency amendment request of August 6, 1984 in order to avoid delay in Unit 2 startup.

Prior to requesting a Technical Specification change, the licensee investigated plant hardware design changes and modifications which could resolve the discrepancy. This option was estimated to result in a 22 week delay in startup due to time constraints in procuring certain hardware components. This request was received without sufficient time to permit prior notice and opportunity for public comment.

Final No Significant Hazards Consideration Determination

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards considerations if operation of the facility in accordance with the 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.

The information in this SE provides the basis for evaluating this license amendment against these criteria. Since the requested change does not affect the original design basis, plant operating conditions, the physical status of the plant, and dose consequences of potential accidents, the staff concludes that:

- (1) Operation of the facility in accordance with the amendment would not significantly increase the probability or consequences of an accident previously evaluated.
- (2) Operation of the facility in accordance with the amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.
- (3) Operation of the facility in accordance with the amendment would not involve a significant reduction in a margin of safety.

Accordingly, we conclude that the amendment to Facility Operating License NPF-5 requiring that certain containment isolation valves be automatically closed upon receipt of a low-low-low reactor water level signal involves no significant hazards considerations.

State Consultation

In accordance with the Commission's regulations, consultation was held with the State of Georgia by telephone. The State expressed no concern either from the standpoint of safety or of our no significant hazards consideration determination in view of the fact the changes makes the Technical Specifications consistent with the original signal design specifications and with the as-built systems.

3.0 ENVIRONMENTAL CONSIDERATIONS

The amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and a change to a surveillance requirement. The staff has determined that the amendment involves 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 made a final no significant hazards consideration finding with respect to this amendment. Accordingly, the amendment meets 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 amendment.

4.0 CONCLUSION

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

Dated: August 22, 1984

Principal Contributor: D. Pickett and E. Butcher, Jr.